

From: Lisa Johnson
Subject: Reg Z - Truth in Lending

Comments:

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Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
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Name: Lisa Johnson
Affiliation:
Category of Affiliation:
Address:
City:
State:
Country: UNITED STATES
Zip:
PostalCode:

Comments:

Consumer protection should always be at the top of the priority list. However, elimination of the Yield Spread premium does not allow the mortgage brokerage industry to FAIRLY compete with retail bank establishments which will not be subject to the rule. Their profit is always undisclosed because it is based on secondary market forces. The banks receive a "different" YSP from FNMA/FHLMC. It is unfair and irresponsible to punish a certain segment of the finance community in order to APPEAR to do good works in the interest of the consumer. Either make retail banks subject to the same rules as broker/bankers or allow us honest brokers to continue to properly disclose the YSP to our clientele" and to earn the commission of which our clients are fully aware. This type of competition between broker/bankers and retail banking institutions will allow for proper market competition which will ultimately allow for better service and pricing for the consumer