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Subject: Reg Z - Truth in Lending

Comments:

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Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
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Comments:
To whom it may concern, I would like to express my view point to this proposal. We are a licensed mortgage broker in the state of New York, and for us to provide the competitive service we offer in comparison to the retail lenders, it is imperative that we still receive yield spread from wholesale lenders. Most of the borrowers today refuse to pay points so that is the only means of us making a living at arranging financing for the consumer. With all do respect we have complied with the new rules and regulations that have been thrusted upon us, and not to mention the additional expense of obtaining government licensing to perform FHA loans and maintain our audited financials so we can still be able to perform for the consumer at an optimum level of efficiency and knowledge of lending guidelines that are ever so changing in this tough economic environment. It seems to me that the "powers that be" are trying to divert the blame of this financial crisis that has fallen upon all of us.
Not to sound redundant, however mortgage brokers were not the reason that Wall Street and major banks, such as Chase, and Citibank developed loan programs with minimal to little financing that caused that housing market bubble to explode in a negative way that set the average consumer in a spiral downward to not being able to afford the loan that was offered to them. We are seeing signs of the mortgage mess coming to an end, however we need to concentrate on helping the consumer reach the end goal of home ownership and not try to force small businesses to close the doors so that the major lenders can monopolize the lending market. After all it does seem to be headed in that direction with using the mortgage broker as the scapegoat for the errors that have occured. REMEMBER WE ARE ONLY THIRD PARTY PROVIDERS. Let us try to work together and not pass the blame. Let us all become a part of the solution. Don"t take away our livelihood. We all have families to support just like you, as well. Yield spread allows us to stay in business and pay the bills and rent and monthly expenses associated with mortgage brokers to help circulate the economy. By

eliminating this incentive to do business you will have forced thousands of working professionals to seek other employment and create another crisis of unemployment that we have seen in these past few years. Thank you for your time and cooperation in this matter.