

From: Daryle L Messina
Subject: Reg Z - Truth in Lending

Comments:

Date: Sep 29, 2009

Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
Document ID: R-1366
Document Version: 1
Release Date: 07/23/2009
Name: Daryle L Messina
Affiliation:
Category of Affiliation:
Address:
City:
State:
Country: UNITED STATES
Zip:
PostalCode:

Comments:

Under R-1366 the changes are clearly intended to protect the consumer and while every consumer needs guidance and advice through one of the largest financial decisions they will ever make, the proposed changes misses the mark. Eliminating Yield Spread will only increase the costs of borrowing money for the average consumer. In addition, competition like any other business most often results in lower costs to the end consumer. By essentially eliminating brokers and many small bankers competition no longer will exist. In every industry a natural check and balance happens when everyone is playing on a level playing field. Banks or banks employees are not any better equipped to handle a clients mortgage when compared to a Loan Officer working for a Mortgage Broker. In most cases mortgage brokers are better educated on the entire process. Handcuffing them or creating a flat for service will devastate and only increase costs to the consumer. YSP is a vital part of helping homeowners refinance while keeping costs reasonable. Elimination of YSP would only raise costs or other third party fees as well as the interest rate. This solution leaves too much power in the hands of few and will eventually be a tremendous detriment to both existing homeowners and future homeowners alike. Respectfully, Daryle Messina