

From: Beata Bukowski  
Subject: Reg Z - Truth in Lending

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Comments:

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Proposal: Risk-Based Capital Guidelines; Capital Adequacy Guidelines; Capital Maintenance: Regulatory Capital; Impact of Modifications to Generally Accepted Accounting Principles; Consolidation of Asset-Backed Commercial Paper Programs (Regulations H and Y)

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Comments:

This proposal is to supposedly help the consumer- all it does is eliminates competition to banks and thus builds monopoly - which is never good to the consumer. Costs of the HVCC are already passed on to the consumer - in effort to protect them - consumers pay double for the same appraisal work they did before. Same appraisers do these appraisals but they are ordered by appraisal management companies - who pocket the extra fees in the name of protecting the consumer! Eliminating yield spread premium will do the same - increase costs to consumers, and eliminate brokers who (in opposite to what most banks are saying are NOT THE SOURCE OF ALL EVIL - brokers offer programs that banks develop - not create them) lower the bank's costs and are able to, by regulating their yield spread premium, offer no cost closings or lower borrowers rates substantially! STOP THE NONSENSE! STOP POINTING YOUR FINGERS AT ONE GROUP OF PROFESSIONALS, only because their lobby is not as strong as the BANK'S lobbyists are. think logically for a moment.