

From: American California Financial, Andre D Hemmersbach  
Subject: Reg Z - Truth in Lending

---

Comments:

Date: Sep 22, 2009

Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages  
Document ID: R-1366  
Document Version: 1  
Release Date: 07/23/2009  
Name: Andre D Hemmersbach  
Affiliation: American California Financial  
Category of Affiliation: Commercial  
Address:  
City:  
State:  
Country: UNITED STATES  
Zip:  
PostalCode:

Comments:

It seems that Legislators do not understand enough about the lending business to comprehend YSP (Yield Spread Premium) as a tool that is used to provide a discounted price for closing a transaction. In some instances this IS the best option for the consumer and removing this as a tool hurts not helps borrowers. No doubt our industry needs reforms but legislation that reduces consumer choice to protect a segment of the buying public from a few bad apples seems like bad governing. It would be much better to put laws and guidelines in place for ethics, national licensing, SIMPLE and standard disclosures and then enforce those guidelines with life time bans from our industry.