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Comments:

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Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
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Unfortunately, the law makers here have very little working knowledge of how the industry actually works. Many of the previously enacted "protections" for the consumer have in fact cost them (the consumers) money and opportunities. We spend more time educating consumers about all the regulations and why we can not now take measures to know if the loan will make it to fruition and accomplish the goal set forth. Instead we need to spend time explaining why they need to sit by their computer to make sure they get their disclosures, why they need to spend way more money on appraisals and rate locks, how we have no ability to verify if they are anywhere in the ballpark for what they believe their home value to be, why they are currently homeless because the HVCC appraiser is taking their sweet time..As a Senior Mortgage Advisor for over 12 years I feel I spend more time reading about changing guidelines and processes that are drastically different from one lender to the next and running through my head the millions of hurdles with time lines and expectations. The advising part has been less about the consumer's goals and more about how to make it happen and navigating through all the minutia. I am strongly supportive of new disclosures that are simplified, that will definitely help me as I have never had issues with disclosing yield spread or fees or product. My borrowers always know the goods and bads of any product and at what price they are getting it. What I am opposed to is eliminating my ability as an advisor to help select a product that does in fact meet the needs and goals of my client. If you eliminate yield spread you take away a tool to manipulate and tailor a loan specific to a consumers needs. Further, these "proposed" laws and bills never give you the actual way this is going to work-just a theory, and we later have to figure out the process. Buyers and refinancing clients are NOT the only consumers. There are also sellers, lenders, short sale negotiators, asset managers, judges, executors, divorce attorneys and underwriter who all need to agree on a deal. There are many moving parts in a transaction that is way more complicated than just appeasing one person--if that were the case there would

never be an agreement/contract. Enough is enough here..are we REALLY saying consumers are that stupid--that we have to dumb it down and by doing so eliminate their financing options to such an elementary level. Where is their responsibility in assuring they are well advised of their largest financial decision? I have been broadcasting a real estate radio show for over 3 years now to help consumers make smarter financial decision and I do believe in education but of course you can not make someone learn if they are not interested. What we should be spending our tax dollars on is educating consumers at a much earlier level than the day they decide to buy a home. Home buyer education should be mandatory. What makes me a great mortgage advisors is my ability to ask enough questions of my borrower and to structure a loan that makes the MOST financial sense for their individual needs, this new proposal makes me just an order taker because it takes away my tools for the above purpose. Once again the theory is great but in practice it just doesn't seem to work-much like the rest. We have already gone through every possible background/fingerprint/financial statement/credit check possible. It's time to put the onus on the consumer and give them back some of their responsibility here in taking some time to select the right professional and educating themselves on what they qualify for. Further, another suggestion would be to decide what exactly is acceptable and get everyone on the same page for lending guidelines. Not everyone fits in a perfect box, and because each lender is responsible to their investors-they tend to all have different appetites and thresholds-which seems to change daily. There was a time when I knew exactly if someone would qualify and today because of the ever changing rules and guides that is becoming more and more difficult. If we could get everyone back to the same page and set some standards throughout the industry and eliminate lender overlays over and above the products themselves we would be in much better shape. How about implementing mandatory unemployment insurance to cover them for the 1st so many years of the loan? Just a few suggestions from someone who lives and breathes a business that has been severely handicapped by some bad decisions intentioned to help, but in practice cripple.