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Comments:

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If Truth-in-Lending is designed to help consumers understand the impact their closing costs are going to have on their implicit interest rate, then the form ought to display not only the APR but also the note rate. Displaying just the APR in bold, without also displaying the note rate, is confusing. Borrowers struggle to understand the concept of APR. Consequently, when they see a form with an interest rate, in bold, that is different (and higher) than the rate their loan officer discussed with them, they are left confused. If the note rate were on the Truth-in-Lending disclosure form, along with the APR, they could grasp the concept. Isn't that what we are trying to do for the consumer? Aren't we trying to help them grasp the concept?