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Subject: Reg Z - Truth in Lending

Comments:

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Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
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To whom it may concern, Eliminating the use of Yield Spread Premiums (SRPs) will give large, national banks an unfair advantage. The end result will be higher interest rates and costs to consumers, plus longer periods to close a mortgage transaction. Thousands of small mortgage companies will be forced out of business. In today's market, your average mortgage broker can close a No Cost refinance in 2-3 weeks. The large national banks are taking 3-4 MONTHS, plus they charge higher rates and fees. Passing this legislation creates an unfair playing field stacked against small business and in the end will cost consumers more money and eliminate No Cost options. Please allow free market competition between the banks and brokers by keeping the Yield Spread Premium. Thank you for your time.