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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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Sirs: Although good in intent, the repercussions for the Consumer and Small Businesses are immense and negative. 1) The elimination or controlling of YSP or SRP for brokers is very ONE sided. BANKS, Big Box lenders....receive the same fees. Many big lenders have committed similar offenses. If you must control, control for banks (yes, they make YSP and SRP on their warehouse lines, but don't have to show it.) Imagine posing the same rule to Physicians who promote or prescribe various medications and treatments for favorable treatment from pharma companies. As written, this eliminates income that is used for consumer benefit, marketing, keeping the doors open, paying employees, and profit. 2) Big Lobbying and Legislation favors big bank industry. If this rule is passed as is....many brokers will close shop. big banks will like that. Consumers will pay the price, as will many employees. Consumers will PAY more for loans that before were No Cost, Low Cost, or the broker paid some fees. Those fees are always paid from the SRP or YSP. 3) Lack of competition...conspiracy....anti-trust: if you diligently research, it has always been the independent mortgage broker who has led the way on innovation, low cost pricing, and consumer benefits. The big banks followed...because they had to. Sirs, eliminate ANY restrictions on loans or loan compensation. You'll throw out the baby with the water AND you'll only favor big business.