

From: Marc Ogata
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: Marc Ogata
Affiliation:
Category of Affiliation:
Address:
City:
State:
Country: UNITED STATES
Zip:
PostalCode:

Comments:

I have been in the financial industry since 1985 and have seen many changes. More recently I was in consumer banking for 18 years and since May 2008 I decided to start a career as a mortgage originator. As a mortgage originator I never had the chance to provide a sub-prime loan for a borrower because those programs were eliminated for obvious reasons. However, I had several occasions to offer option ARM programs and the like while in the banking industry right out of a local branch of the bank where I was a Manager. My point is this. Why is the mortgage brokerage industry taking the punishment of reform for everyone else? I say punishment because basically, the majority of the changes that have been made or proposed will basically "fire" all us from this profession. YSP is not the problem. Taking away more options for the consumer is not the answer. The mortgage broker provides a necessary option for the consumer. If the only option left is getting a loan through the bank, how does that benefit the consumer? Currently on a consistent basis, a typical consumer will pay more money for a mortgage through the retail bank than they would through a mortgage broker. How do I know this? I've been on both sides. In an industry where choices have been reduced dramatically because of past deeds which no longer are available, why give the consumer even less choice. These reforms are designed to take care of issues that have already happened. Where were these changes when they REALLY needed to be in place. A day late and a dollar short. Again, why is the mortgage broker being held accountable for misdeeds of those who are not around anymore. Don't make changes just to make a point or to create a scapegoat for a problem that went way beyond the mortgage broker. It's time to use a common sense approach so solving problems.