From: Allied Home Mortgage Capital Corporation, Tenille Sonethongkham

Subject: Reg Z - Truth in Lending

Comments:

As a mortgage broker, I would like to oppose Reg Z Docket No. $-1366, eliminating par plus pricing for mortgage brokers. As a mortgage broker, I am able to shop rates, as well as products, for my customers, in their best interests. Par plus pricing is the way that we earn our paychecks. If we don"t have any par plus pricing, and don"t charge the customer any upfront fees, we won"t be able to stay in business, therefore, doing our customers a disservice. The only way to stay in business would then be to charge the customer up-front fees. This is going to do much more damage than good. Banks make just as much money as brokers. They charge par plus pricing, but they are not regulated as we are to disclose these premiums. In this way, we are being discriminated against.

In the most respectful way possible, I would like to plead for this regulation not to pass. I am a very well-respected mortgage broker, and if I was to be forced to close up shop, many homeowners would not be able to get financing. I do mostly government loans, rural development, fha, and veterans administration loans. none of the banks in our area do those loans. Therefore, our customers would be left high-and-dry on these loan products.

Respectfully,

Tenille Sonethongkham
Allied Home Mortgage Capital Corporation