

From: PrimeLending, Dave Carnahan
Subject: Reg Z - Truth in Lending

Comments:

Date: Dec 23, 2009

Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
Document ID: R-1366
Document Version: 1
Release Date: 07/23/2009
Name: Dave Carnahan
Affiliation: PrimeLending
Category of Affiliation: Other
Address:

City:
State: UT
Country: UNITED STATES
Zip:
PostalCode:

Comments:

The proposed legislation is another kneejerk reaction to trying to right the Mortgage Industry. We all know that changes are necessary, but the focus needs to be on the true issues that are broken. The problems with this legislation have been well documented in the previous posts, and need to be listened to, destroying an entire industry and leaving the public to deal only with the Banking Monopolies would be a terrible injustice, but just what the Banks and their lobbyists have been hard at work promoting. I have worked as a broker and for one of the largest national banks, and I can tell you that the customer service, the turn times, the pricing and the best needs of the customer have never been worse than what I saw at the bank. In my state they loan officers are required to go through extensive training as pass an exam, not if you work for the bank, and the knowledge level shows. As far as pricing, the bank hides behind the undisclosed SRP, which was 1.5% factored into the rates, that the borrower is never made aware of. With the tightening of the underwriting guidelines, we have seen a tremendous drop in business throughout the industry, and the exit of a good majority of loan officers, this alone has rid the industry of many of the types that we needed to get out of the industry. It needs to be stated that although everyone wants to blame the Brokers and wholesalers for this mess, the majority of us were doing loans the correct way and truly taking care of the borrowers, that is why we have a strong referral base and have been able to remain in the business. This being said the loan programs we were selling were designed and underwritten by the very banks that your proposal will now force the borrowers to use exclusively and at retail pricing. I am looking to reward the banks for the mess they have caused, then go ahead and pass this legislation and screw things up even more.