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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
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FRB - COMPENSATION COMMENTS The changes proposed to Regulation Z by Section 226.36(d), Prohibited Payments to Loan Originators will negatively impact consumers through the reduction of choice and through the unnecessary restriction on options they would otherwise enjoy which would allow them to manage the various costs associated with obtaining or refinancing a mortgage. The Board specifically seeks comment (Federal Register page 43245) about "alternatives to the proposal that would further the purposes of TILA and provide consumers with more useful disclosures". In that regard, submitted with this comment is a position statement and proposed one page addendum, which if used in conjunction with the detail information presently contained on the Good Faith Estimate (before the HUD Regulation X changes) will much more directly "further the purposes of TILA and provide consumers with more useful disclosures."

As the position statement explains the misunderstanding that resulted in the carve out of what is commonly referred to as Yield Spread Premium has taken the mortgage disclosures in a direction that fails to further the purposes of TILA and confuses the real issue while making comparison shopping much more difficult. By applying the very straightforward recommendations in the position statement and by using the shopping tool in conjunction with information that is already generally available, the Board could add tremendous value to the Regulation Z changes without the negative consumer and business impact implied by the current proposed changes. Thank you for reviewing the explanation and suggested changes. Please seriously consider them. They represent a "real" consumer oriented alternative that will achieve the Board's and TILA's objectives.