

From: UpFront Mortgage Brokers Association, Sherry Healy  
Subject: Reg Z - Truth in Lending

---

Comments:

Date: Dec 12, 2009

Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages  
Document ID: R-1366  
Document Version: 1  
Release Date: 07/23/2009  
Name: Sherry Healy  
Affiliation: UpFront Mortgage Brokers Association  
Category of Affiliation: Other  
Address:  
City:  
State:  
Country: UNITED STATES  
Zip:  
PostalCode:

Comments:

Why is every new law in the name of "consumer protection" really only benefit the lenders that seek to reduce competition? We know that there are fewer banks now left lending and the so-called YSP is not a secret. In fact it predominately featured throughout the disclosure process and while I do not prefer to be paid this way, it is important to some borrowers for these reasons: 1) The borrower cannot roll the broker fees into the loan amount as it will push the loan amount over the FannieMae county loan caps. 2) The borrower has limited money and when given the choice, would prefer to paid .125 to .250 higher on a rate (usually about \$20 more a month) than come up with the \$3,000 to pay the broker in the paid out of escrow closing fees. The bottom line is let the BORROWER decide and don't make any more laws to benefit the consumer that in reality really only benefit the lenders who will severely constrain brokers from their ability to shop rates for consumers.