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Regulation Z - Truth in Lending - Closed-end Mortgages [R-1366] / I have been in the business over 13 years and its never been a more transparent work practice. I pride myself in being a mortgage professional and I have been in all levels in the industry. Wholesale plays a crucial role in contunuing to solve this mortgage crisis. This crisis occured because of bad credit ratings and lax underwriting guidelines to meet secondary market volume requests for securitization. The problem is not on the loan originators. Of course there are always bad apples in any industry but at the end if secondary market or investors demand certain loan characteristics with high risk being rated high by the rating agencies the wholesale lenders won't create loan programs at high risk and therefore we as originators won't and can't sell the non available program. We don't create the programs we only sell what's available. YSP plays a crutial role in our industry. This keeps us very competative, allows for low or no cost loans for borrowers and gives them an option if they want to pay upfront or over the life of the loan. Consumers today are more educated than ever and they always shop around. A flat fee would not work, because it would create steering to the highest bider without a benefit to the consumer. A flat fee would not work becasue that would eliminate a no cost loan or a discounted loan and WILL INCREASE the consumers costs. I am confident that you are not trying to do this. Second, an hourly basis loan would be impossible to track. We get calls all day in regards to a file, some loans require more time than others, closings get delayed and so forth. What if the consumer gets a lazy and slow loan originator then that wouldn't be beneficial to the consumer. Lets keep transparency here and the new GFE already serves that purpose. Lenders are being stricter on lending and in supervising best practices to ensure consumer protection. We as originators are already capped at 5% max not to mention that everyone else's fees are added in so we are not even close to making that kind of money. Lenders are now capping YSP to an avergae of 2.5% and with the exsessive third party fees (Title, Title Agents

Fees, Up Front MIP..etc..) we never come close to making 5%. On average we are probably making 1.5% to 2% on FHA deals if the loan amount is high enough and 1.75% to 2.25% on Conventional deals. Realtors are not capped and they are making up to 7% commission and in reality we carry all the pressure and added work to make sure the deal concludes. Please lets keep competitive lending in place and the opportunity to help consumers have the option of a no cost loan especially for those hard pressed borrowers that can buy but need some assistance in terms of the closing costs. I want to say that at least 99% of the bad apples have left this industry to work a 9 to 5 job and the industry leaders like myself are still here with best practices and pride. I have been a C level executive at a chartered bank, a wholesale and correspondent account executive, a loan originator, and a banker and I can assure you that this new lending environment is more transparent than ever and the bad apples have rotten. If you have any questions, please feel free to contact me at any time. Respectfully, Jesus Jimenez