

From: Jon P Esposito  
Subject: Reg Z - Truth in Lending

---

Comments:

Date: Dec 22, 2009

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

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

Comments:

First, please note that the Federal Reserve should not involve itself in the residential finance industry. In fact, it has no right to do so. This is HUD's area of expertise. Additionally, this proposal (Regulation Z - Truth in Lending - Closed-end Mortgages [R-1366]) is extremely harmful to consumers and potentially bad for the economy. The enactment of R-1366 will end up causing discrimination against lower-income/lower wealth individuals (i.e., those with lower home values and loan amounts), as it will either force these borrowers to pay disproportionately higher fees OR cause mortgage lenders to deny these loans without cause. Further, this proposal will likely have the effect of stifling competition in the residential finance marketplace - exactly the opposite of what needs to happen. In sum, this is a very bad proposal for all of America.