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Subject: Reg Z - Truth in Lending

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Comments:

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Comments:

The proposal, although well intended, will NOT make the process easier for the consumer to understand, in the first instance. In the second, altering the way mortgage brokers are compensated is, in my opinion, likely to make rates higher for the consumer. Lastly, the entire process of APR (again, though well intended) is not the best way to help the consumer shop for the best offer. Simply knowing the actual interest rate and the costs of closing the transaction would be the better way for a consumer to comparison shop. Utilizing artificial means to compare loan A to loan B and allowing the typical legislative "loopholes" is only confusing to most consumers. The proposal also ignores the reality of "disclosing" to a borrower when they are in the home shopping phase. It occurs to me that once a property is selected and the borrower is preparing to close is the better time accurately identify the true costs of the transaction. In many ways, this proposition aligns with the recently imposed HVCC regs. Again, though understandably well intended, it has simply resulted in higher costs to the consumer, added time to an already lengthy process and has resulted in reports that are of less quality because the appraiser is often unfamiliar with the area. Please understand that I support the concept that the borrower should be fully informed of matters that impact the interest rate and the closing process. I just do not agree this proposal will accomplish that objective. In reading some of the testimony and logic presented, it appears most of this is directed at the mortgage industry that existed several years ago and is long gone now!! I'd be happy to discuss these issues with any of your staff. Thanks for the opportunity to comment.