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Comments:

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Please consider our comments to one of the seemingly endless Regulation Z proposals. We are a small \$85 million community bank with one compliance officer. It has been extremely difficult/impossible to keep pace with the onslaught of new or revised regulations in the last two years and the myriad of rule changes that will occur with the Dodd-Frank Act. All these rule changes dramatically increase the costs of compliance through system changes, training, updating policies and procedures, and the like. These requirements unfairly and disproportionately effect small lenders. Community banks were not the cause of the financial downfall, yet we are having to pay a heavy price in overregulation as a result. In addition, consumers are provided more and more disclosures--most of which they may not even read or comprehend. This interim rule was published on 9/24/10 and becomes effective 10/25/10. Compliance is optional until 1/30/11. This would mean that all financial institutions that utilize lending software (and most likely that is 100% of them) are at the mercy of their software vendors to implement this significant change within a 4-month period. In our opinion, that is just not enough time to update all the necessary data fields, test the changes, and communicate with institutions as to the changes. More importantly, **WHY DOES THIS RULE NEED TO BE IMPLEMENTED IN THE FIRST PLACE?** We understand that it was required by MDIA; however, the revised GFE and HUD-1 have similar requirements that should suffice in the interim.

The Dodd-Frank Act will require that the GFE and TIL disclosures be combined into a simpler format. Why institute such a revised rule when it will all have to be changed again within the next year or so? Financial institutions spent a considerable amount of time understanding (and we still don't fully understand) all of the RESPA rule changes and implementing these revisions. The same holds true for all of the TIL changes. It appears again that the

industry will have to ignore all of those changes and implement new RESPA (and TIL) disclosure rules in the future. We recommend that the interim rule not be implemented due to the onerous burden of implementation of a rule that will cease to exist in the near future. They are very complex nearly impossible to forecast accurately. Similar requirements are already in RESPA and REg X. STOP THE MADDNESS. These types of regulations are sapping the lifeblood out of our small lenders and driving them out of business. Many consumers won't be very well served if there are fewer and fewer lenders.