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Subject: Credit Risk Retention - Reg RR

Comments:

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Proposal: Credit Risk Retention
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Gentlemen: As credit risk is beyond hard measurement and since recent history shows debt issuers have incentive to underestimate risk, increase the amount of retained risk from 5% to 10%. A mortgage is a contract is a mortgage and further qualification, e.g. QRM, etc. is confusing, unnecessary and invites exploitation. Keep it simple.

Nathaniel Pulsifer