From: SunTrust, Janet Farmer

Proposal: 1411 (7100-AD70) - Credit Risk Retention

Subject: Credit Risk Retention - Reg RR

Comments:

Docket Number R-1411

Dodd Frank Risk Retention and Qualified Residential Mortgage

I do not support this legislation for the following reasons

- 1) It will further restrict credit for well qualified borrowers by reducing the Loan to Value and Debt to Income Ratios
- 2) FHFA statistics show that 80% of the GSE business from 1997-2009 would not qualify under QRM test.
- 3) The cap on fees at 3% would hurt lower income families that have a need for lower loan amounts and it doesn't account for bona fide discount points.
- 4) I support the proposal made by the Mortgage Bankers Association

Thank you,

Janet Farmer Senior Loan Consultant

2475 Northwinds Parkway Suite 100 Alpharetta, GA 30009

Live Solid. Bank Solid.

SunTrust is a federally registered service mark of SunTrust Banks, Inc. Live Solid. Bank Solid. is a service mark of SunTrust Banks, Inc.