From: Blake Kleckner

Subject: Reg Z - TILA Mortgage Disclosure Improvement

Comments:

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Name: Blake Kleckner
Affiliation:
Category of Affiliation: Commercial
Address:
City:
State:
Country:
Zip:
PostalCode:

Comments:
As I understand it, R-1366 is attempting to eliminate the yield spread premium (YSP) from the loan structuring and calculation. The entire basis for determining interest rates (IR) is dependent upon YSPs. Without them, lenders' rate sheets and pricing engines would cease to exist. How would IRs then be determined? Since 1/1/10, the advent of the new Good Faith Estimate, mortgage brokers have been required to give YSPs to their clients as credits against loan costs. So, how can the elimination of YSPs be good for borrowers? The end result will be increased loan costs to them reducing the number of loans that will be completed, and further depressing, the already depressed, housing market. If this aspect of R-1366 is implemented, it will be devastating to the housing market, the country, and the world. How can anyone believe this is the right thing to do?