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Subject: Reg. Z

Comments:

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Comments:

As a 40 year commercial banker and having spent most of that time on the credit side of the bank (currently CCO of a small bank in the Denver area)you are making this way too hard. Allow one loan structure period. 30 year fixed rate, no prepay, maximum 40% back end ratio, maximum LTV 90%, minimum FICO 650. Obviously no negative am., full qualification no stated income. No exception for rural or "underserved"-that's just another way to make a bad loan. You qualify or you don't. We don't owe anyone the ability to buy a house especially leveraging them up to do it.