

From: Linda Hand
Proposal: 1417 (RIN 7100-AD75) Reg Z - Mortgage Repayment Standards
Subject: Reg. Z

Comments:

I know that the intention of all these new rules and regulations has been to ensure that we are instituting safe mortgage lending practices and protect the consumers from predatory lending. I agree that this was long overdue. Unfortunately, what has happened as a result of all of these new regulations and restrictions is the exact opposite. Consumers are now paying higher interest rates along with MUCH higher fees. There has been so much focus on the lenders that the title companies have gone unchecked. Their fees have tripled in some cases in the last several years. The new loan officer compensation has effectively increased the rates that the consumers are paying for their loans and the banks are the beneficiaries of this increased revenue. It has reduced the loan officers income at a time when they are working harder and longer on every loan. Many have seen a reduction of their incomes by over 50%. These are not "predatory Lenders", they are hardworking, professional people who have not done anything wrong. This is unnecessary and unfair. I think there is a more effective way to actually accomplish what all of these regulations intended to do without having the unintended negative consequences and fall out. The housing industry is still struggling, consumers are paying more, loan officers are making less and working harder and the very banks that took the government bail outs continue to profit from the situation which they played a big part in creating. Does that make any sense? Sound lending practices need to be in place but at the same time we need to implement a refinance program that allows home owners who have been making their mortgage payments on time, but perhaps now find themselves in a position of reduced or no equity, the ability to take advantage of lower interest rates to refinance their loans and lower their payments without being prevented by the decline in the current value of their homes. Common sense dictates that if we can help these responsible homeowners lower their mortgage payments it will result in them having more money to spend on other things and help to stimulate the economy.