

From: State Bank and Trust Company, Deborah James
Proposal: 1417 (RIN 7100-AD75) Reg Z - Mortgage Repayment Standards
Subject: Reg. Z

Comments:

The purpose of my e-mail is to express my concern about the above referenced docket. Due to the points and fees limits, I fear that consumers will not be able to obtain lower loan amounts. It is very common in many of our Georgia markets for loans to be less than \$75,000. The inability to obtain lower loan amounts will have a noticeable impact on low-to-moderate income and minority families. A higher threshold loan amount will better serve our communities and \$150,000 to \$200,000 would be more appropriate.

The limit on "points and fees" needs to be revised to exclude employee compensation to avoid such compensation being counted twice. The "points and fees" calculation should not include double counting of any item.

The vast quantity of new regulations is stressing financial institutions and making it difficult for us to serve consumers. We are having to pass along the associated added expenses to our consumers and they in turn end up paying more for loans. It is also perplexing to see the dwindling number of consumers who can obtain mortgage financing.

I urge regulators to adopt a definition of "qualified mortgages" which can then serve as the "qualified residential mortgage" definition under the risk retention rule.

In closing, it is critically important that all other proposed rules be published for comment to allow mortgage lenders the opportunity to express their concerns before final rules are adopted.

Kindest Regards,

Deborah James
State Bank and Trust Company