

From: 1st Choice Mortgage, Mark Taylor
Proposal: 1417 (RIN 7100-AD75) Reg Z - Mortgage Repayment Standards
Subject: Reg. Z

Comments:

I am just an honest loan officer who has been providing competitive products to consumers for the past 13 years. I have competed with all local and national lenders and banks and in the past have been able to match or beat any other terms and fees offered to secure my client's business, confidence and loyalty. With the new regulations being placed on the lending industry it is making it harder to remain competitive and survive. The loan products and practices that created the mortgage meltdown has been resolved. With the reduced volume of loans and the education requirements, all of the unqualified and unscrupulous loan officers have found something else to do. I understand the stigma that has been created unscrupulous loan officers of past years but there are a lot of honest hard working loan officers like myself who still want to survive in this industry and provide the best products and terms available to our clients. we have lives and families too that depend on us.

Please consider the following:

The safe harbor must set forth clear and concise standards with a bright line test so that lenders can readily determine and prove their compliance with the standards.

We fear that consumers will not be able to obtain loans of less than \$75,000 due to the points and fees limits, and this likely will adversely impact minorities. A higher threshold loan amount will better serve consumers. May we suggest that \$150,000 would be more appropriate.

The proposed rule adversely impacts affiliated business arrangements which Congress deemed permissible in RESPA. Many fees charged by such third party settlement service providers are prescribed by state law. Therefore, there is no reason to treat affiliated third party settlement service providers differently than those which are not affiliated with the lender.

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 proposed rule leads to fewer safe and sound product options to consumers due to treatment of private mortgage insurance premiums which likely will increase the dominance of government loans in certain markets.

The vast quantity of new regulations is stressing lenders and making it difficult to serve consumers. Many banks and smaller lenders are leaving the market which adversely impacts consumers by restricting access to credit and making loans more expensive for those who can obtain them. Please adopt a definition of "qualified mortgages" which can then serve as the "qualified residential mortgage" definition under the risk retention rule.

Also, we ask that another proposed rule be published for comment before final adoption and implementation.

Thank you for your time!

Mark Taylor
1st Choice Mortgage