

From: SunTrust Mortgage, Stuart Saunders
Proposal: 1417 (RIN 7100-AD75) Reg Z - Mortgage Repayment Standards
Subject: Reg. Z

Comments:

Having reviewed the matter, here's my two cents on the matter at hand.

- We should adopt safe harbor as opposed to rebuttable presumption about a borrower's ability to repay.
- Third party affiliated business arrangements have been approved by Congress so we should continue to keep them in place.
- The points and fees calculation should not count any items twice, including employee compensation.
- If the rule is adopted as it stands now there will be fewer options available to consumers

Stuart Saunders
SunTrust Mortgage