

From: Midland Mortgage Corporation, Becky Thompson  
Proposal: 1417 (RIN 7100-AD75) Reg Z - Mortgage Repayment Standards  
Subject: Reg. Z

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Comments:

Please adopt a safe harbor (as opposed to a rebuttable presumption) This needs to be set forth clear and concise standards!

Many of the industry fear that consumers will not be able to obtain loans of less than \$75,000 due to points and fees limits! I suggest t hat \$150,000 would be more

Appropriate.

The proposed rule adversely impacts affiliated business arrangements which Congress deemed by state law. There is not reason to treat affiliated third party settlement service providers differently than those which are not affiliated with the lender.

The limit on "points and fee must 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!!!!

I for one have been in this business since 1971 and I have never seen so many rule changes and are detrimental to the housing industry and in turn the Financing of these houses.

Becky Thompson  
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