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Comments:

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Comments:

This proposal will have a deleterious effect on a housing industry that is already on life support. While it is critical that private lenders determine a borrowers ability to pay, the underwriting criteria should be determined by the individual lender and based on the terms of the loan, not by a government entity. For example, if a lender were willing to accept interest only payments at a lower interest rate during times when a borrower is suffering financial hardship, the lending criteria could be completely different than if a lender were to lend at a fixed rate regardless of circumstances. Some people may not have other debt, and could afford a higher front end debt to income ratio than someone carrying a higher debt load. A lender should have enough flexibility to underwrite a loan that is appropriate for the borrower. Bruce R. Norton