From:Fred GranlundProposal:1417 (RIN 7100-AD75) Reg Z - Mortgage Repayment StandardsSubject:Reg. Z

Comments:

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These regulations are entirely inappropriate for private mortgages (i.e. seller carryback financing). It's the banks that no longer have the ability to correctly underwrite loans and qualify borrowers. Private lenders have been doing it very well for years. Imposing qualification testing on private mortgages would act to discourage sellers from offering financing and thus close a vital market for potential buyers who may not be eligible for bank financing. There is no evidence that additional regulation is needed for seller financed mortgages, and the American Dream of home ownership depends on having a this type of financing available when it is needed. Do not impose any additional burdend on these transactions.