

From: Carol Clark Law, Michael A. O'Neill
Proposal: 1411 (7100-AD70) - Credit Risk Retention
Subject: Credit Risk Retention - Reg RR

Comments:

Dear Board of Governors of the Federal Reserve System:

As a closing attorney and an affiliate member of the Mortgage Bankers Association of Georgia, I have concerns over the Dodd-Frank Proposed Rule. I have noticed in my closing practice that it is getting more and more difficult for buyers to realize their dreams of home ownership. If the Dodd-Frank Proposed Rule is adopted, this dream will become unattainable for most people.

According to information provided to me, it could take up to 18 years for the typical household to save a 20% down payment for a typical home. More than 75% of all my closings have seller-paid closing costs. Without the seller-paid closing costs, most buyers will have to bring more money to the closing table- money they do not have.

With buyers unable to purchase homes, sellers will see the value of their homes plunge even more. Many sellers have invested their life savings in their homes and depend on the value of their home for their retirement. The proverbially "slippery slope" will be a reality when sellers are stuck in their homes and can't retire.

As the son of a Dominican immigrant, I see that my relatives in their 20s and 30s cannot qualify for a mortgage. They have to live with their families or rent because when an immigrant moves to the United States from another country, he or she cannot bring their savings. In addition, many immigrants are forced to pay full price for college. With the astronomical costs of college reducing whatever savings the immigrant has, this Rule will be a further obstacle to home ownership and unfairly impacts immigrants and minorities.

I support the Mortgage Bankers Association's position on the Rule because it takes into consideration my concerns outlined above. I again implore you to consider the effects of the Rule and its many unintended consequences.

Sincerely,

Michael A. O'Neill
Carol Clark Law

