From: David M Neylan

Subject: Credit Risk Retention - Reg RR

Comments:

Date: Jun 03, 2011

Proposal: Credit Risk Retention

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As a member of the mortgage industry for over 15 years, I agree there needs to be restrictive measures in place to not allow the mistakes of the past to occur again. However, the proposed definition of a QRM is too restrictive and will have an adverse effect on the desired outcome of stabilizing our housing industry. I urge a reconsideration of the definition of a QRM and that a less restrictive position be taken. This is a very critical issue that if not re-evaluated could significantly harm the housing industry, create a bottleneck of liquidity, and slow down the fiscal recovery of our great nation.