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Comments:

Public Comments on Credit Risk Retention:

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I urge you to remove the rigid down payment, loan-to-value (LTV) and debt-to-income (DTI) requirements included in the proposed Qualified Residential Mortgage (QRM) definition in the proposed risk retention rule. The QRM definition differs significantly from what Congress expressed in the law, and will deprive many credit-worthy middle class families from the promise of buying a home. Consumer groups, community groups as well as real estate and lending organizations have been fervently opposed to the current definition of QRM. I believe the QRM definition to be too narrow and detrimental to potential homebuyers and the economic recovery.