

From: Jef Kelly  
Subject: Credit Risk Retention - Reg RR

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Comments:

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Proposal: Credit Risk Retention  
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Comments:

I agree with the proposed rule that requires sponsors of asset-backed securities (ABS) to retain at least 5 percent of the credit risk of the assets underlying the securities. I would make the amount retained 10 percent for non-QRM. Also in relation to QRM definitions, in order for a down payment to qualify any mortgage it must NOT be borrowed, if the borrowers FICO score is low the down payment should be required to be "seasoned". A saved down payment shows that a borrower has the ability to manage their finances over an extended period of time. A borrowed down payment does not. Thanks Much, Jeff