From: Mark Pickens

Proposal: 1443 (RIN 7100 AD 90) Higher Risk Mortgages

Subject: Reg. Z - Interagency appraisal requirements for higher-risk mortgages

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Comments:

The FDIC and Truth in Lending Act regulations for appraisals for higher risk mortgage loans is biased and just wrong on so many levels that they cannot all be listed here. Some are:

1. Small institutions inherently charge a higher rate than larger institutions due to a higher spread is required to net the same ROA.

2. Very small institutions mortgage rates are not included in the calculations for average prime offer rate, and should be excluded from all laws affected by such.

3. The definition of high risk mortgage loans only takes into account the interest rate and not any of the 5 C's of credit.

4. Our bank is 18 million in assets, and the majority of loans made previous to the "Great Recession" and "Mortgage Crisis" were mortgage loans that now would be considered "high risk", and we have not, and will not, loss a mortgage loan in this century.

5. This law, and others like it, remove small institutions for the mortgage market and thus removes competition from the marketplace. It also makes it almost impossible for small institutions to comply with CRA regulations if we are not allowed to make a mortgage loans.

6. This law is biased against small institutions and will force even more to get out of business. Maybe that is the reason for the law.