

From: Laura Triplett
Proposal: 1406 (RIN 7100-AD65) Reg Z-Revise Escrow Account Requirements for Certain Home Mortgage Loans
Subject: Revision to Escrow Account

Comments:

Date: Feb 20, 2013

Proposal: Regulation Z - Truth in Lending Act - Revision to Escrow Account Requirements for Certain Home Mortgage Loans [R-1406] Document ID: R-1406 Revision: 1

First name: Laura
Middle initial: S
Last name: Triplett
Affiliation (if any):
Affiliation Type: Other
Address line 1:
Address line 2:
City:
State:
Zip:
Country:
Postal (if outside the U.S.):

Your comment: I am originating fannie mae agency loans and there are fannie mae adjustments to pricing for lower credit scores that are causing HPML violations. I am not understanding why the comparison to an index that does not take into account that there are legitimate pricing adjustments imposed by Fannie Mae. I am unable to get an answer to this question from anyone in regulatory compliance.