

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

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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.