From: Clarksville Mortgage Corporation, Scott Phillips

Subject: Reg Z - Truth in Lending

Comments:

Date: Dec 04, 2009

Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
Document ID: R-1366
Document Version: 1
Release Date: 07/23/2009
Name: Scott Phillips
Affiliation: Clarksville Mortgage Corporation
Category of Affiliation:
Address:
City:
State:
Country: UNITED STATES
Zip:
PostalCode:

Comments:

Since 1999, my small company has been able to provide lower rates than big retail lenders such as Wells Fargo and Bank of America. If Bank of America offers 6% with zero points, I have been able to offer 5.875% and zero points. The yield spread premium system works and it saves consumers money on a huge scale. In 2007, I went to work for Wells Fargo because they are my favorite wholesale lender and I consider them to be the best mortgage company in the country. I joined their retail operation. After ten-months, I left because I now needed to offer higher retail rates to my clients. I re-opened my business in 2008 and I again had the lowest rates in our market. I don't understand why you continue to target the broker and not the large retail lenders? Why are their servicing release premiums not an issue. A retial lenders servicing release premium is much larger than any yield spread premium that I have ever made. Consumers don't understand the implications of servicing release premiums yet you leave the large, retail lenders alone and give them billions in TARP money? Brokers have survived because we offer a better value to our clients. We are small companies. We don't have the national recognigion or branding of the big boys. Unfortunately, we don't have the strongest lobby/lawyers either. Please get to the source of the problem. Get to those who make the rules. He with the gold makes the rules. Brokers don't have the gold. The big boys do. We just work harder and for less to the benefit of our clients.