

From: Marguerite Roberson  
Proposal: 1417 (RIN 7100-AD75) Reg Z - Mortgage Repayment Standards  
Subject: Reg. Z

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Comments:

This communication is offered in support of the creation of a bright line legal safe harbor as part of the proposed Ability to Repay Qualified Mortgage regulation. I have reviewed the testimony of Hank Cunningham and offer complete support of the eloquent testimony that has provided an accurate report of the impact of the proposed regulation.

There are numerous points in the proposed ruling that adversely affect the consumer's ability to obtain an affordable loan.

The ruling will lead to fewer safe and sound product options for consumers. The cost of the lending products will increase along with the narrow restrictions of the lending guidelines. I have already seen a dramatic increase of cost to the consumer; the proposed regulation would accentuate even more. The limit on "points and fees" must be revised to exclude employee compensation. The "points and fees" must not include double counting of any item.

Many lenders in the industry will not be able to offer loans under \$75,000.00 due to these limits. The more "affordable" properties for the "lower income" households will be unattainable. The market has been overcome "unnecessarily" with foreclosed properties. The properties cannot move in the market without borrower capability.

Too much regulation can be much worse to the consumer than too little, in many instances. Government oversight is a necessity for the people. Government control of an industry is unrealistic.

The new existing regulations have already caused the real estate market to become "stagnated". Many excellent borrowers have not been able to obtain financing due to the current restrictive guidelines. The Secondary Market MBS investors have added their own "layering" of more restrictions. The industry became "scared of it's shadow".

The "third party" appraisal requirements have eliminated accountability. The "short sale" property "norm" today has ruined the real estate market for at least a decade to come.

Regulators who are removed from the "real lending world" cannot possibly understand the impact an "at first glance" regulation can have on the industry and the economy.

I have been involved in the real estate industry for over 38 years. I learned the quality, ethical lending criteria in the early 1970's. There is a cavernous difference between best lending practices and erroneous criteria the "shuts the door" for good qualified borrowers.

There was a 1999 governmental directive to "ease" lending requirements and open the door for "the dream of homeownership to all Americans". There were those that took advantage of that. The "financial crisis" was real and could have been specifically pinpointed, corrected, handled and ended. This became a "Grand Canyon".

Industry seasoned professional bankers, mortgage bankers, realtors, builders, attorneys and appraisers should be gathered in regional areas and have "on the ground" knowledgeable input into the "safe harbor" of the governmental proposals.

Another proposed ruling must call for these professionals to have the knowledgeable comments before any regulatory adoption or implementation.

I have always provided knowledgeable and ethical customer care. I have been

blessed to have loved my job, my customers, my community and my country. I have become extremely stressed and to the point of physically ill over all of the erroneous decisions that have put the possibility of homeownership almost totally out of reach of the people of this great country. Please listen to the voice of the industry who truly cares for the well being of our communities.

Marguerite Roberson