

From: "Nathan Russo" <nrusso@actionmtg.net> on 04/04/2008 09:40:03 AM

Subject: Regulation Z

The above proposal will effectively eliminate independant mortgage brokers nationwide. This will cause much more harm than good, since the majority of mortgages made in the U.S. are made by mortgage brokers. Without these independant brokers, the remaining lenders will be inundated with applicants they simply can't accomodate. In addition, there will be less competition in the marketplace which will hurt potential borrowers, not help them.

The proposed restrictions concerning the APR tests are outrageous. They are MUCH TOO CONSERVATIVE, since they effectively classify ALL HOME LOANS AS HIGH-COST HOME LOANS. They also will discriminate against self-employed borrowers who frequently need low, an no-income verification loans. The majority of these loans DO PERFORM without delinquency.

Nathan M. Russo
Vice President
Action Mortgage
800-331-4715 x 12