From: "Jim Loveland" <jrl721@cox.net> on 04/07/2008 08:55:04 AM

Subject: Regulation Z

Dear Sirs,

My name is Jim Loveland and I am employed by Homecomings Financial in Pensacola, Fl.

I support strongly the consumer protection goals of the Federal Reserve Board's proposed amendments to Regulation Z, but respectfully oppose the proposal to restrict compensation for mortgage brokers. Mortgage brokers provide as an intermediary between borrowers and lenders, and the value the broker adds in the real estate transaction by serving BOTH parties, but representing NEITHER. The changes appear that they will drive the brokers out of the mortgage industry. Loss of mortgage brokers as a result of changing the profitability model of the broker will result in further deterioration of the real estate market. Another side effect is reduced competition for loans- thereby increasing costs to a customer. The distinctions between brokers and lenders have blurred in recent years as lenders themselves typically package and resell loans they originate. Consumers are largely unable to distinguish between brokers and lenders, which have similar names, use similar signage, and rely on similar advertising. So it is indeed unfair to penalize for nothing other than the way a loan is packaged. All producers of loans must be treated equally.

The other area that has just about become impossible is to give exact quotes for costs prior to an application. With all of the changes to FNMA- on truly has no idea of what rates and fees any loan will be subject to. According to your new guidelines- even FNMA (our government backed agency) will be providing high cost loans- Something must be wrong with the definition of high cost loans if that is the case.

Thank you for considering the comments enclosed.

Respectfully,

James R Loveland