From: Dennis Reece [mailto:dennis@ouraynet.com]
Sent: Tuesday, September 11, 2012 6:26 PM
To: Comments
Subject: September 5, 2012 - FDIC: Truth in Lending Act(Regulation Z)

TO WHOM IT MAY CONCERN:

I AM NOT SURE THIS IS THE WAY TO MAKE A COMMENT BECAUSE IT IS NOT EASY TO REPLY TO THE PROPOSED RULE MAKING ANNOUNCEMENT. BUT HERE GOES. My first time to give input. To require an appraisal to make a consumer 1-4 family real estate loan and then not allow the lender to collect the actual cost of the appraisal fee is absurd. This does not protect the consumer, it causes the lender to tell the potential borrower to seek financing somewhere else. These types of changes are not to protect the consumer, but to harm the consumers ability to obtain loans at a local bank. Many of the new regulations are harming the local bank and the consumer both. What was once simple and workable has become a poor way to do business. These new regulations are killing the banking system. The system was not broken and was working, and now I see banking slowly going down the tubes. It is time to wake up before it is too late.

A good example of poor regulation is the Recession regulation. In over 40 years of making home loans, I have had only one person choose to rescind the loan. He later came back and took the loan. This regulation, only makes the consumer mad because they had to wait for their funds.

Another problem is requiring escrow for taxes and insurance. This is not good for some borrowers. It causes their payment to go up beyond their ability to repay. Some borrowers can pay quarterly or annually but cannot afford to pay monthly escrows. This is harmful to single female borrowers who have limited income. This needs to be repealed.

Thank you,

Dennis F. Reece, President The Citizens State Bank of Ouray

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