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Pennsylvania Department of Banking
Attn: Office of Chief Counsel
17 North Second Street, Suite 1300
Harrisburg, Pa. 17101

INDEPENDENT REGULATORY
REVIEW COMMISSION

DEPARTMENT OF BANKING
LEGAL SECTION

Dear Council:

I am writing this letter in response to the new mortgage regulations that have been proposed by the Pennsylvania Department of Banking and are being considered by the commonwealth's Independent Regulatory Review Commission. While I wholeheartedly agree with the spirit and goal of the new regulation-to protect consumers from facing foreclosure-I do not believe that these regulations will be an effective instrument in achieving this stated goal.

As a mortgage banking professional since 1974, I take particular exception to the section of the new regulations that seeks to terminate stated-income and no-doc loans. I can tell you from my vast experience in the industry that both of these loan programs have a valid place in the market when they are utilized correctly. It is my professional opinion that these loans themselves are not the problem, but rather that they have been used incorrectly in the past by a few less than moral loan originators.

It is my professional opinion that the main reason for foreclosure have remained consistent and can be attributed to loss of job, divorce, illness and other unexpected changes in lifestyle, but not stated-income and no-doc loans.

In my opinion, eliminating these programs will hurt the people who are supposed to be helped by these rules and will now be underserved as a result of their implementation. These regulations will not only hurt the mortgage and real estate industry but most importantly, the consumer.

I urge you to reconsider the proposals and look for an alternative that will better serve the consumer.

Sincerely,



Eric Fishman
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Dresher, Pa. 19025
215-280-4371