

# SHB 2770 Rulemaking - "Disclosure Summary" Comments

**Name:** Marge Bearman

**Received:** July 08, 2008

**Comments:**

Deb Bortner and the team at DFI

On July 2nd I attended the meeting in Renton. It is my pleasure to be a part of any decision making process revolving around our industry. I have been in this industry for 20 years and it is a passion for me. I take great pride in all that I do.

Per our discussion and your request, I have attached my notes on suggested verbiage for several areas of the disclosure. It appears that a main goal is to keep it simple and clear with all the main points of the proposed loan. Adding commentary or descriptions may be best used if brief and to the point. If the consumer is in fact comparing the facts will be clear and comparing simple. If they are not comparing at least they have all the facts on one page. Using mortgage lingo does not seem helpful to consumers.

In some areas such as adjustable loans, I added more detail that I feel is important to know. In other items such as YSP, I made a plain short statement.

The question on fees: Is this form for the purpose of explaining broker compensation or is it to clarify the terms and costs of this loan? If it is to clarify the costs of the loan, it would seem best to do a lump sum of all non reoccurring costs. If we itemize, we are simply going to duplicate the good faith estimate which is redundant and increases the chance of confusion of the consumer. If it is to explain broker compensation, it would seem that only broker compensation should be included. Is there a tolerance level? Third party costs are estimated at the beginning and may change when a vendor is not hired. On purchases often realtors or sellers dictate escrow and title companies which will make those numbers vary.

At our company we do initial good faith estimate, interim when new numbers are obtained from third parties or converting from a float to lock or if any other changes effect costs. I believe this is the way a good broker behaves.

Thank you for the opportunity to share my opinions.

Sincerely,

Marge Bearman, Principal Broker/Owner  
Choice Lending Inc.