

# SHB 2770 Rulemaking - "Disclosure Summary" Comments

**Name:** Jeffrey Lorsch

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**Comments:**

Cindy,

Per our conversation, attached please find the 4-disclosures (2-draft blanks; 2-sample completions; fixed and adjustable) your requested.

With respect to --

- Income figures - I am glad to hear it has been eliminated.
- Don't understand contact... -
  - 1) KISS - The less text the more likely it will be read and meaningful.
  - 2) This is not required by the Bill.
  - 3) I would hope commonsense prevents the need for this kind of statement, in that if you don't understand something you ask the party who is furnishing (or selling) it to you to explain it. Therefore, any statement should direct the borrower to seek an explanation from the disclosure's provider before contacting any third party, government agency or not. Remember, the role of the provider includes educating the borrower so let's give the provider the opportunity to fulfill its role. Do we want the borrower going to the third party every time there is a question? Definitely not; we want the provider to 'provide.' (If the provider can't explain it to the borrower or provide adequate answers to other questions I would recommend the borrower find another provider who can rather than relying upon a third party's help.)
- Definition of YSP - I'm concerned by the addition of a definition for two reasons --
  - 1) KISS - The less text the more likely it will be read and meaningful.
  - 2) This is not required by the Bill.
  - 3) Evidently the definitions proposed by WAMB have not been acceptable to DFI. The definitions proposed by the various consumer groups at the hearing have not been correct or beneficial to the two parties to the disclosure - the borrower and provider.

Please do not hesitate to contact me should you have any questions or concerns.

Thank you and best regards,

Jeff

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