



**City of Cleveland**  
Jane L. Campbell, Mayor

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Cleveland City Hall  
601 Lakeside Avenue  
Cleveland, Ohio 44114

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June 24, 2002

Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552

Attention: Docket No. 2002-17

Dear Sir or Madam:

The city of Cleveland strongly supports the proposed changes to the Office of Thrift Supervision's (OTS) regulations implementing the Alternative Mortgage Transaction Parity Act (AMTPA) allowing state chartered institutions to avoid state limits on prepayment penalties and late fees. The proposed legislation provides a powerful tool for reducing abusive loan practices that have plagued Cleveland residents over the last several years.

We are currently involved in reviewing files of persons who have sought financial assistance because they can no longer afford their mortgage and were seeking foreclosure prevention assistance. Many of the loans were alternative mortgages, (i.e. ARM's) and many contained prepayment penalties. Not providing for limits on prepayment penalties and late fees does nothing to protect persons from unscrupulous loan practices.

I commend the Office of Thrift Supervision for proposing this rule change to their AMTPA regulations and urge the OTS to implement the new regulation as soon as possible.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jane L. Campbell".

Jane L. Campbell  
Mayor

cc: National Community Reinvestment Coalition