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Subject: EGRPRA

I would recommend both to Congressional representatives and to regulators that a test marketing be done on proposed regulations to better insure that the intent of the regulation and effort is being served effectively. I believe I was told through FDIC sources that they may be considering market testing revisions of the Privacy Act Notice. I fully support this methodology and believe that it should be used for all regulations.

I fear that the consumer that we as government leaders are attempting to protect through disclosures are not effectively being reached through the volumes of fine print and complex disclosures that we are required to provide. Closing a home mortgage today is overwhelming for a college PhD let alone a hard working blue collar worker that is not as apt to read volumes of fine print. Once a consumer attempts to read the first few pages of an advance disclosure I believe they often times throw up their arms in distress and accept what is in front of them. Market testing disclosures would be a great method of measuring various ways of getting the information to the consumer. If one recalls what the financial industry did to provide banker's with disclosure information on investment security "stress test", the industry developed some nice graphic thumbs up and thumbs down and some other little graphs that depicted cash flow duration. I would venture to say that many investors came to accept the thumbs up and thumbs down much better than reviewing the volumes of financial disclosure statements and yield tables that came along with the investment purchases. With regard to Reg Z and mortgage disclosures, perhaps a simple graphic that would show the consumer their APR relative to current secondary market indexes on a certain date would be an easy way to illustrate if they are getting a competitive mortgage product. With regard to Privacy perhaps a simple sign such as a green light, yellow light, red light, would be an indicator to consumers that there is no sharing, there is sharing between affiliates, or there is open sharing of information. There could be one simple format issued to accompany the symbol that would be uniform among all agencies, businesses and disclosing parties. Consumers would have an easy and uniformly understood indicator of the security of their personal information when dealing with that entity.

Our government has implemented standards of agencies that require them to compute the time it takes to complete a government form. Perhaps there should be a mandate on Congress as well as on the regulators that they be required to develop regulations which require at least a 50% (or some acceptable percentage) effectiveness of an implemented regulation with regard to the intended purpose of the law. We need to address the question "Will 50% of an average consumer group understand the disclosure when presented to them as required by the proposed law?". If and when we fall short in this regard we are simply imposing a cost, which eventually falls upon the consumer, for a very ineffective mandate.

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