



February 9, 2009

Jennifer J. Johnston
Secretary, Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

RE: Docket No. R-1340

Dear Ms. Johnston,

Thank you for the opportunity to comment on the proposed changes to Regulation Z mandated under the Mortgage Disclosure Improvement Act (MDIA). These comments are submitted on behalf of Branch Banking and Trust Company (BB&T), the lead bank for BB&T Corporation. BB&T is a state-chartered non-member southeastern regional bank with approximately 1500 branches.

BB&T supports the efforts to improve consumer disclosures and would not oppose providing early Truth-in-Lending disclosures to all consumer purpose mortgage loans (home equity loans excluded) as proposed. While recognizing the July 30, 2009 deadline for these new disclosure requirements meets the 12 month timeframe in the MDIA, BB&T is concerned that the development and implementation of new disclosures and policies and procedures, and the training that must accompany them will make compliance extremely difficult.

The MDIA also mandates that early disclosures be provided to a consumer at least 7 days prior to consummation. This is a provision in the MDIA and therefore required by statute. However, BB&T is asking the Board to consider broadening the scope of 'bona fide personal financial emergency' under its rulemaking authority.

The new waiting periods imposed by this rule, absent a conforming reason, could delay loan closings. This delay does not automatically transfer any additional benefit to the consumer, particularly those consumers that may be relying on funds from a refinance for purposes which may not qualify as a 'bona fide personal financial emergency'. For example, a consumer may want cash out from a refinance to improve their home, but those improvements are non-emergency improvements. The consumer may have negotiated a special agreed-upon price with the contractor, but that price will expire before the loan can be closed. BB&T believes the consumer is better served by allowing a little more leniency in determining valid reasons for waiving the waiting period.

BB&T requests that the Board consider conforming the timing requirements in the proposal to avoid confusion. A bank must *deliver* the early disclosures within 3 days of application and at least seven days prior to consummation, but the consumer must *receive*



a redisclosure at least 3 days prior to consummation. As a matter of practical application, if the timing requirements were all based on the delivery, it would greatly reduce the chance for inadvertent errors.

BB&T strongly disagrees with Board's estimate of the time required to update the disclosures. Even though the Board has provided model disclosures, the required programming cannot be accomplished in 8 hours. In addition to the programming changes, there will be significant training efforts to implement these changes.

Thank you,

A handwritten signature in black ink that reads 'Sherryl McDonald'. The signature is written in a cursive, flowing style.

Sherryl McDonald
Senior Vice President
BB&T Corporate Compliance