

From: [Bruce Calabrese](#)
To: [#FHFA.REG-COMMENTS](#)
Subject: [EXT] Closed End 2nd Mortgages
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I am really NOT for them if you are going to place a penalty for early payoff on the Seller Servicer and we can't pass it on to the consumer.

This is really an unfair advantage that the GSE's have in issuing these products. It places all the unknown risk on us the seller servicers.

If we can't pass the early payoff penalty on to the consumer we are not interested. There should be NO early payoff penalty to the Seller Servicers.

Thanks,

Bruce Calabrese - CEO
(614) 582-0037
Equitable Mortgage
655 Metro Place S.
Dublin, Ohio 43017
NMLS # 79376 / 39843