

lation depend on which approach is more likely to elicit support from the Congress and the community as a whole. As is true with most legislation affecting the District of Columbia, the support of Congress is required for an adequate budget and the support of the population is required for adequate implementation. In the case of consumer protection legislation which affects so many persons, the need for the confidence of the community should be taken into consideration when you make your decision. As so much will depend on the Department of Consumer Protection, we trust that whatever is done will result in an agency which has the wherewithal to do the job. If the frustration and resentment to which we made reference above is to be mitigated, the poor in our city must have a place to go with their complaints and persons to whom they complain must be armed with the authority and means to do away with the inequities.

MARYLAND CONSUMERS ASSOCIATION, INC.,
Annapolis, Md., January 30, 1968.

SUBCOMMITTEE ON BUSINESS AND COMMERCE,
Senate Committee of the District of Columbia
Washington, D.C.

GENTLEMEN: The Maryland Consumers Association strongly supports the enactment of S-2589, S-2590, S-2591 and S-2592, all bills to improve consumer protection in retail sales of consumer goods in the District of Columbia. Consumers in the State of Maryland would be benefitted by these bills because metropolitan Washington is one large inter-related community and the protection afforded by these bills would extend beyond the District line.

We commend Senator Tydings, who as representative of our State in the U. S. Congress, has introduced these bills and is guiding them through the Congress.

The Maryland Consumers Association does not oppose S-316, an earlier bill introduced by Senator Morse for the same purposes but the bills introduced by Senator Tydings are more comprehensive and more specific and would therefore be more effective in their purpose.

Sincerely,

W. W. FLACK, *President.*

STATEMENT OF MORTGAGE BANKERS ASSOCIATION OF METROPOLITAN
WASHINGTON, INC.

I am B. Francis Saul, II, President of the Mortgage Bankers Association of Metropolitan Washington. Our Association represents 43 mortgage banking companies in this area.

I wish to testify with regard to Senate Bill 2592. The Mortgage Bankers Association shares the concern of this Subcommittee that the right of all parties to foreclosure of real property in the District be equally protected.

We suggest that the Bill be modified to exclude FHA and VA loans because adequate notice already exists; in addition, that commercial and business mortgages be excluded because they are not applicable. In addition, we feel that the provisions of this Bill should apply only to single-family homes and apartment buildings of four apartments or less.

We would also suggest a 30-day notice be required to be given to the Mayor's office or designee prior to foreclosure, along with notice to the borrower and owner of record and in addition, that notice be posted on the premises.

We make these suggestions believing that they do not alter the intent of Bill 2592, but rather that they further the purpose of this Bill. As it now reads, Bill 2592 is not in the best interest of either borrower or lender, because it is unnecessarily costly and time-consuming.

The time required in the consummation of foreclosures is, in our opinion, important both to the borrower and the lender. For instance, many foreclosures are due to marital problems instead of financial ones. Both parties may leave the premises, even though the mortgage is paid down and a substantial equity exists. A fast disposition of this property is necessary to preserve the equity in such a case for the benefit of the borrowers.

We are also concerned that any change does not unintentionally discourage mortgage money from investing in the District of Columbia; this would work a hardship on all parties involved.

Respectfully submitted.

B. FRANCIS SAUL II,
President, Mortgage Bankers Association of Metropolitan Washington.