

From: NARAB, Edward N Lampkin Jr.  
Subject: Regulation Z -- Truth in Lending

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Comments:

Date: Nov 20, 2010

Proposal: Dodd-Frank Act- Regulation Y - Conformance Period for Entities  
Engaged in Prohibited Proprietary Trading or Private Equity Fund or Hedge Fund  
Activities

Document ID: R-1397

Document Version: 1

Release Date: 11/17/2010

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How can appraisers be protected from the threats to withhold payment/future assignments? Who defines what is appropriate? We need a more detailed definition. How about a method to report unscrupulous behavior of lenders and AMC's? With HVCC and AMC's fees are pretty much based on the lowest bidder. Would you look for the cheapest fee for one of the biggest discussions you would make in your life, purchasing your family home? Should an AMC have direct or indirect interest, financial or otherwise in the property or transaction involving the appraisal? Kind of means they are controlling the process of valuation amounts. Appraiser are State licensed and have Standards that we must follow, Why are we not letting the States handle