

From: Dann Cann  
Subject: Regulation Z -- Truth in Lending

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Comments:

Date: Nov 30, 2010

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

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Comments:

I would like to comment on the section of Dodd-Frank that deals with reasonable and customary fees. I am a Certified Genreal Appraiser and hold the SRA designation from the Appraisal Institute. What is reasonable and customary fees for me may be different that a begining appraiser with little experience. It is my suggestion that the fee you set will become the floor price for some appraiser and the ceiling price for others. I personally set my fees by the amount of time required to gather the data and write the report. In areas that have a plethora of data online the time required to complete a report is much less than in some areas that I serve there is no on line data available. In those areas it may take me twice a long to complete a report as it does in an area that has easy access to data. The fee you set will become my floor price in areas that have easy access data, and in the areas that data is scarce it will be a starting place. Thank you Dann Cann,SRA