From: Michael R. Kronenberg

Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act Document ID: R-1394 Document Version: 1 Release Date: 10/18/2010 Name: Michael R Kronenberg Affiliation: Category of Affiliation: Address: City: State: Country: UNITED STATES Zip: PostalCode:

Comments:

I need to tell you that being an appraiser is no longer a family wage profession if Appraisal Management Companies choose appraisers soley on the basis of "who can do it the cheapest so we can make the greatest margin on the backs of those who actually are doing the work"! The un-intended consequences of the HVCC and it's reliance on AMC to fill the "fire-wall" void between lenders and appraisers has seen the quality of appraisals decline as well as the number of appraisers that can afford to continue. Any "reasonable & customary" fee analysis must be done without the involvement of AMCs. There are several studies and surveys that support a reasonable and customary fee that any appraiser would charge the lender directly for their services. You must rely on these studies and not what the AMC are telling you about fees! It is true that some perform a valuable "scrubbing and review" function. The good ones are those to add their fee for this service to the appraiser's normal fee and do not attempt to make their profits by "low-balling" the appraiser and at the same time, charge the consumer "full price" (and then some). PCV Murcor is one such AMC! Thanks for considering my comments, Michael Kronenberg Certified **Residential Appraiser**