

From: Van Owens
Subject: Regulation Z -- Truth in Lending

Comments:

The above proposed regulations relate to what is a fair and reasonable appraisal fee.

Real Estate Appraisers are considered professionals, and their fee should be based on an hourly rate.

Not all real estate is the same, and therefore the hourly fee rate will reflect the job complexity.

HVCC is illegal and has to end. The "code" reflect total dependency on being within the AMC's realm.

There is no appraisers independence within the HVCC, Those who suffer with the installment of the HVCC are:

- [1]. consumers
- [2]. homeowners
- [3]. loan brokers / officers
- [4]. Real Estate Appraisers

Those who gain with the HVCC are:

- [1]. AMC
- [2]. those who own the AMC's

I am a 20 year real estate appraiser.

Van Owens