From: Jason C. Cosetti

Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 14, 2010

Proposal: Regulation Z - Truth In Lending Act

Document ID: R-1394 Document Version: 1 Release Date: 10/18/2010 Name: Jason C Cosetti

Affiliation:

Category of Affiliation:

Address: City: State: Country: Zip:

PostalCode:

Comments:

The new model of removing commission based agents from the appraisal ordering process, I believe is a step in the right direction. However the unintended consequence is the rise of AMCs that continue to charge the consumer market or above market rates, yet pay the appraiser a fraction of market. This consequence will have a detrimental effect on the future of appraising and security for the lending institutions. Please give guidance on paying appraisers market rate while still having the safety of an AMC.