From: William J. Miklos

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: WILLIAM J MIKLOS

Affiliation:

Category of Affiliation: Other

Address: City: State: Country: Zip:

PostalCode:

## Comments:

THE INDEPENDENT FEE APPRAISER IS THE ONLY BUSINESS THAT CANNOT DETERMINE FEES.

NOR HOW THEY MAY BE COLLECTED. MOST AMC'S DEDUCT THE COST OF THEIR DOING BUSINESS FROM THE APPRAISERS FEE INSTEAD OF GETTING THEIR COST COVERED AS COST

OF DOING BUSINESS WHEN PART OF A BANK OR LENDER. IF THEY ARE NOT OWNED BY A BANK OR LENDER THAN THEY SHOULD RECEIVE THEIR FEES AS A SEPERATE COST FROM THEIR CLIENT (THE ONE ORDERING THEIR SERVICE). FAIR AND REASONABLE FEES SHOULD BE GOVERNED BY THE AMOUNT OF WORK REQUIRED TO COMPLETE THE ASSIGNMENT, IE COMPLEX PROPERTY, ATYPICAL PROPERTY, ETC. WHEN THE APPRAISER WAS ALLOWED TO

QUOTE HIS OR HER FEES IT WAS TRULY FOLLOWING THE FREE ENTERPRISE SYSTEM AND THE

ASSIGNMENT WENT TO WHOEVER WAS QUOTING THE MOST REASONABLE FEE FOR FOR THE

SCOPE OF WORK TO BE PERFORMED.REMOVING INDEPENDENT MORTGAGE BROKERS WAS A LARGE

MISTATE. THE PRESSURE ON THE APPRASIERS WAS NOT ONLY DONE BY SOME BROKERS BUT

WAS ALSO DONE BY DIRECT LENDERS AND AMC'S. THE REMOVAL OF THE BROKERS FROM BEING ABLE TO ORDER APPRAISALS DIRECT IS ALSO LIMITING THE FREE ENTERPRISE SYSTEM. LETS CALL THE HVCC WHAT IT REALY IS, THAT IS TO SAY IT WAS A POLITICAL TOOL USED BY A MAN WHO WAS TRYING TO WIN VOTES TO BECOME GOVERNOR OF NEW YORK.

IN DOING SO HE MANAGED TO BLACKMAIL FANNIE MAE AND FREDDIEMAC INTO ACCEPTING HIS IDEA OF APPRAISERS INDEPENDENCE. WHAT HAS REALLY HAPPENED IS THAT THE APPRAISER IS NOW MORE DEPENDENT ON SATISFIYING AN AMC OR HE HAS NO WORK, WHAT

EVER HAPPENED TO USPAP WHICH REQUIRES AN APPRAISER TO BE GEOGRAPHIC COMPENTENT.

AMC'S SENDING APPRAISERS TO AREAS THE ARE NOT KNOWN BY THE APPRAISER BUT

## WAS

HIRED BECAUSE HE/SHE IS WILLING TO WORK FOR THEIR FEES AND TURN TIME. THE BEST YOU GET FROM THIS COMBONATION IS A VERY PPOOR PRODUCT. ALL OF THIS HAS TO CHANGE OR THE WHOLE APPRAISAL PROFESSION WILL DISAPPEAR.