From: MAI Real Estate Appraisal, William G. Bowen

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 G Bowen

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Category of Affiliation: Other

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Comments:

I have been a RE appraiser for 38 years. Studied for 15 years to be awarded the MAI appraisal designation. I have been the only one in Hagerstown and the best appraiser in town. Our residential fees were \$375 for a URAR and now with the Appraisal Management Companies our fees are \$200 to \$290 and they require unreasonable delivery times in this rural market and additional data. Further, I used to do most of the residential work for several local lenders. Now I am one of 3 or 5 on a panel and only get every third or fifth assignment. The management companies always use the cheapest appraisers. We have appraisers coming from northern Virginia (100 miles) to do appraisal in Hagerstown. I am pleased you are looking at fees. In our rural market, sometimes you need more time to do the necessary research to provide a proper conclusion of value.