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Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act

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## Comments:

It comes down to this: If appraisers are considered an integral and important part of the real estate process and authentic professional, then.... 1. Pay them more than a clerk or secretary would make per hour (1.e., at least \$50/hour on average). This is the REASONABLE part! 2. Just as in the teaching profession, remove the deadwood and those who don't care, are incompetent or who are just marking time as formfillers so that when clients pay a full and fair fee, they are likely to get commensurate value in return nearly all the time. I have been on the VA Panel as an appraiser for several years. Their fee schedule is reasobale, fair and adjusted regionally for cost of living. Use this as a model. The appraisers on the VA Panel with whom I am familiar are all first-rate, because the VA screens them. The best part is that the VA spends very Ittle time policing the appraiser pool and wringing its hands over appraiser competence and more time helping the pool of appraisers polish their already considerable skills to become even better. Isn't that what the real estate industry should be doing? Again, if you don't think that the appraisal function is important, keep the status quo, current system and rudderless fee schedules we now have, but don't be shocked if the same problems and abuses by appraisers continue as always.