From: Paul J. Herzog

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: Paul J Herzog Affiliation: Category of Affiliation: Address: City: State: Country: Zip: 5 PostalCode:

Comments:

Performance incentives / Pay Raises The aspect of AMC's and the industry of Fixing appraisal fees due to the new HUD 1 requirements strips the individual Performace incentives from out industry. If an appraiser can out perform other appraisers by quality and turn-a-round they should be compensated at higher rates. Pay Raises no see impossible due to the appraisal industry not dealing individually with clients but in a large lump mass of persons. The net result will be that good appraisers will leave the industry because other industries can pay higher and there is little incentive for new people to get in to a stagnant income industry. Final result will be poor appraisal quality throught out our country.