From: Chuck Toler

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: Chuck Toler

Affiliation:

Category of Affiliation:

Address: City: State: Country: Zip:

PostalCode:

Comments:

It seems to me the VA payment schedule has always been fair and reasonable. Prior to HVCC, my normal fee for a standard 1004, before the 1004 MC, was \$350. Now I am lucky if I can get an assignment for \$210, including the 1004 MC. This is neither reasonable or customary. I've had to leave full time appraising and get another job and do appraisals part time in order to make a living. In the current scenario, the AMC's appear to be the only ones making money. The borrower is forced to pay more for their appraisals than before and the appraisers are forced to work for about half what they did before. Since the lender is the one making the lions share of the proceeds of the loans, they should be the ones to pay the AMC fees and then the borrower would pay a reasonable fee and the appraiser would be paid a reasonable fee. It has also come to my attention that some AMC's are now inserting language in the assignment letters that if you accept the appraisal, you are certifying that the

fee being paid is customary and reasonable.