From: Ronnie W. Lougon

Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 21, 2010

Proposal: Regulation Z - Truth In Lending Act

Document ID: R-1394 Document Version: 1 Release Date: 10/18/2010 Name: Ronnie W Lougon

Affiliation:

Category of Affiliation:

Address: City: State: Country: Zip:

PostalCode:

## Comments:

I have been a certified real estate appraiser for over 15 years and have been performing appraisals for approximately 20 yrs. No one whould dictate our fees. I have no problem with Management Companies entering the market however they do not perform the appraisal. They have a completely different function. The appraiser does all the work in the original appraisal. They also usually have a 3-4 page list of mandatory requirements over and above USPAP (each company different). Their role is advisory, quality control and third party ordering and in some cases storage. It is my opinion that appraiser's should set their own fee and management company fees should be completely seperate just like attorneys, asbtract companies, surveyors and other professionals. Many of these companies are offering and requiring fees at the same rate I used to charge 20 years ago. This is ludicrous. Many of us are lucky enough to have enough work without them but what about the other appraisers that can;t afford to say no. I do not have small children that I have to feed and send to college. Ronnie Lougon Certified Residential Real Estate Appraiser (LA-TX)