From: John J. Ford

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: John J Ford Affiliation: NAIA Category of Affiliation: Commercial Address: City: State: Country: Zip: PostalCode:

## Comments:

As a Certified Residential Appraiser I am on the VA and USDA roster for approved appraisers. I am also on the FHA roster. I perform very little work for AMC's because of their fee structure and required turn time. When they call with an assignment I give them a fee quote and an approximate inspection date. I get approximately 10% of these assignments. They shop for the lowest fee and quickest turn time. Four of the five counties I cover in Missouri are considered rural and there are few appraisers with the appropriate knowledge of those counties. The other 2 appraisers I know that cover those counties do very little AMC work also. So who is doing those appraisals? The VA appraisal fee structure works very well and I think a defined fee structure for all government backed appraisals would solve the problem of appraisers taking assignments in areas they have little or knowledge in and doing it only for the fee.