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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: William Flory

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Comments:

The "appraiser protection" has not worked. It has provided an insulation between lender and appraiser that has gummed the works. In addition, the regulation has created an unfunded mandate on the appraiser. The fee for the middleman comes from a discounted fee to the appraiser. It has also lowered the standards of overall appraisal reporting to the fastest and least qualified appraiser who is willing to accept the conditions and fees of the management companies.