From: Thomas E Runion

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: Thomas E Runion Affiliation: Appraiser Category of Affiliation: Address: City: State: Country: UNITED STATES Zip: PostalCode:

Comments:

A simple solution on C• fees for appraisers would be for the Lenders to decide the C• fee for their borrowers to pay and then pass that complete fee to the appraiser with no offsets. A fee from the Lender for the services that the AMC performs would compensate the AMC. Example; for a standard GSE appraisal order with no additional Lender requirements would be \$350.00 & the credit report is \$50.00, the borrower would pay the Lender \$400.00 with the 350 going to the appraiser & the 50 going to the credit agency, the AMC would be paid by the Lender. This system would be fair to everyone, borrower, appraiser, Lender and AMC and it would be simple and easy to implement, the downside of this is that the Lender and AMC would not be able to get any of the appraisers' fee.