

From: Bryan Parkhurst  
Subject: Regulation Z -- Truth in Lending

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Comments:

1. dodd-frank MANDATES the payment of reasonable and customary compensation to the fee appraiser.
2. hud letter 97-46 has allowed the mortgagor to pay an appraisal fee that incorporates the AMC fee as long as it is customary and reasonable.
3. based on hud letter 97-46 customary and reasonable fees have been established and defined. the hud statements are clear cut evidence of customary and reasonable appraisal fees.
4. if the hud statements are not clear cut evidence of customary and reasonable fees then what has the mortgagor been paying all along under appraisal fees on the hud statement?
5. any other evidence contrary to the hud closing statements would beg to question violations of truth in lending and respa.

THANKS,  
BRYAN PARKHURST