From: Brandley & Associates, C. Mark Brandley

Subject: Regulation Z -- Truth in Lending

Comments:

Dear Sirs,

Appraisal Fees paid to appraisers, by AMC's, have been held artificially low. Assignments outside AMC's are still 30% to 75% more than what they have been paying.

The determination of "reasonable and customary" fees MUST exclude fees paid, past present or future, by AMC's to appraisers.

C. Mark Brandley Brandley & Associates