

From: Absolute Value Appraisers, Brian Decker
Subject: Regulation Z -- Truth in Lending

Comments:

I've been in the business 12 years and currently have to have a 2nd job now that AMC's have squashed this industry. Just imagine legislation regarding any other business that requires a "middle man" or face the possibility of heavy fines (HVAC). For example: Imagine if all law clients were no longer allowed to address attorneys directly - and business must flow through an "Attorney Management Company" which then took half of the attorney fee. And this was law? Imagine this for Doctors or even for Insurance Agents. The fact that this was allowed to pass makes it one of the most unconstitutional acts ever levied on an industry.

Please define the 3rd party independent study to be used rather than allow this play on words to continue. Then those appraisers like me, who have a college education and conduct a professional and honest business - can then determine if the industry will be worth surviving in or if we should flee and leave it to the least experienced cheapest number hitters that the AMC's favor.

To understand what that means to the industry one must imagine themselves as a bank and that they are in the business of providing mortgages for profit. If that were your savings you would, I am sure, hire the most experienced and most reputable appraiser you could find to inspect the property personally and to value it accordingly. There would hardly be an occasion where this would be unwarranted and a mere \$350 to ensure your \$100's of thousands of dollars would be the most well spent money imaginable.

Please do what is right for this industry and the lending industry as a whole: Allow independent appraisers to again build their reputation based on merit and to charge the fees warranted within a free market.

Brian Decker
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