

From: Holt Appraising, Inc., David Holt  
Subject: Regulation Z -- Truth in Lending

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Comments:

To whom it may concern,

My name is David Holt and have been in the real estate appraisal profession since early of 2005. I have not been in the profession for as long as most but have witnessed a change in the way appraisers are being valued. With the implement of AMC's (appraisal Management Companies) we have seen the interest of the quality of work we perform decline. It appears the AMC's are only interested in their profit margins. When we receive calls from an AMC to discuss a potential assignment all they are interested in is what we charge. Since I have been in the profession the fee's have not increased but have actually declined which is not in line with the standard of living increases. I have actually tried not to lower my fees but have lost potential assignments because of this. Most professions in this country are determined by what the professional deems necessary and reasonable to charge for their knowledge and experience not by the consumer, which happens to be the case of the appraising profession. Something needs to take place to reverse the AMC's from controlling how much our services are worth.

Thanks for your time,

David L. Holt  
Holt Appraising, Inc.