From:

Allen Johns

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: Allen Johns Affiliation: Category of Affiliation: Address:

City: State: Country: UNITED STATES Zip: PostalCode:

Comments:

In regards to "customary and reasonable fees" for appraisers. I have been an appraiser over 10 years. I know in our area typical fees prior to HVCC and AMC's fees were typically between \$225 and \$325 for a typical appraisal. The VA fee schedule stipulates \$375 for the area so I don't believe basing fees on the VA fee schedule would be higher than typical fees. Also, by "setting" fees, what does a new appraiser do to get business. I know as a young appraiser I lowered my fees to get work. How does a young appraiser get work when he can't his fee to get some business. I am not against adding protection so an appraiser is paid fairly, however, I'm never for the government setting my pricing. I think most appraiser's word be screaming if the government was putting a ceiling on how much an appraiser can be paid per appraisal, so why is it different when the government wants to put a bottom on it. I have had to alter my business practices with the time and am thriving. I always like the phrase, if you can't stand the heat, get out of the kitchen. Please just keep in mind that not all appraiser's want the government setting their fees, high or low. Thanks