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Subject: Regulation Z -- Truth in Lending

Comments:

Date: Apr 20, 2011

Proposal: Regulation Z - Truth In Lending Act
Document ID: R-1394
Document Version: 1
Release Date: 10/18/2010
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The AMC's owned or controlled by large Regional or international Banking operations are not inclined to increase there low fees. (ie HBSC etc.) This is quite simply because they are owned by the bank and it significantly more profitable to pay low fees to the apprasier but charge high fees to the homeowner who has to paid them, and pocket the difference. Your old regs caused this to happen when you enacted the Cummo bill nationwide (at Fannie Mae and Freddie Mac). The only way to insure that fees are reasonable and customary is to audit the closing statements and levy stong fines to the AMC's that have not changed there fee structure since HVCC mandated appraisers work with 3rd party groups. Only the banks themselves (a select few) have increase fees to the reasonable and customary rates charged by local appraisers. If you would collect the info from the HUD Closing Statements you will find this to be true. In fact some of these AMC's have personally told me that they are waiting for the Fed to take action before they will acquiesce to your decree. Now it is time you take action to right the wrong caused by the previous law governing apprasials and the appraisers. Please level the playing feild instead of supporting the monopoly.