From: Steve L. Hales

Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 21, 2010

Proposal: Regulation Z - Truth In Lending Act Document ID: R-1394 Document Version: 1 Release Date: 10/18/2010 Name: Steve L Hales Affiliation: Appraisal Institute Category of Affiliation: Other Address: City: State: Country: Zip: PostalCode:

Comments:

The first established AMC's sold their services to a lenders touting these services would be "free of charge". Clever but obviously nothing is "free". The AMC's simply took what typically would be a reasonable fee for these services and deducted it from the appraiser's pay. Due to the fear from HVCC lender's jumped on board. No due process. No interaction. No comment period. AMC's simply took their profit from the appraiser's fee and lender's never questioned it. As a result, every appraiser in the country took a 40-50% "hair-cut" mandated by the AMC's. As a result, appraiser's are going out of business on a daily basis. This needs to be rectified now!