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Subject: Regulation Z -- Truth in Lending

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Comments:

Date: Dec 21, 2010

Proposal: Regulation Z - Truth In Lending Act  
Document ID: R-1394  
Document Version: 1  
Release Date: 10/18/2010  
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I have been an appraiser for about 19 years. I built my business on honesty,integrity and accurate appraisals. I did not do business with companies or individuals that wanted me to push values or cut corners. My clients wanted what we offered... honest accurate appraisal. It is unfortunate that since the implementation of the HVCC and now the Dodd-Frank Consumer Protection Act our office has had to resist more pressure with inappropriate appraisal issues that ever before. Only now with Appraisal Management Companies (AMC) there is really no recourse.(How do we go out in the market and find new clients that want honest and ethical appraisers?) We now find ourselves in a situation were we work 30% harder(because of new appraisal requirements) for about 35% less in fees(and our office is luckier than most). I have great fears that even if there is a standard placed upon AMC's to pay reasonable and customary fees there is no enforcement or recourse if they don't conform. If you complain you are off their list. Even if they keep you on their list, they only send appraisals to those appraisers on "premier" lists. Also how do we pass on increases in our costs over time such as gas or the fees for additional work that may be requested. The appraiser's are being held hostage. AMC's are building their business on the backs of appraisers. I know appraisers that accept assingments where the AMC takes over 50% of the appraisal fee. The appraisers accept the work because the have to survice. I personally believe in many cases they are delivering an inferior finished product and trying to maintain their cash flow with increase volume. However, given the increased appraisal requirements this is not possible without compromising the quality of work. What happened to the Free Enterprise System? It seems that reasonable and customary should be the fees that we were charging in our market before AMC's came into existence. Also those fees can't last forever. There needs to be a mechanism to increase fees to pass on increases in our costs and additional work. Also how are you going to enforce fees. What happens when we try to enforce reasonable and customary fees and are taken off the list? We

are struggling to maintain under the current environment.