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Subject: Regulation Z -- Truth in Lending

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Comments:

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Comments:

Enactment of provisions for "Reasonable & Customary Fees" is a MUST! The manipulation of fees charged by the AMC's to the homeowner to accommodate their appraisal management fees, has meant a cut in the professional appraisers fee by as much as 50% since the enactment of the Home Valuation Code of Conduct (HVCC). AMC fees and their participation, if they are here to stay, need to be regulated and consumer education enacted. Beside taking advantage of the consumer and the professional appraisal & housing industry, the enactment of the Home Valuation Code of Conduct(HVCC) has not lived up to it's promise of transparency. All it has done is create a third party involvement in the complexity of the already fledgling real estate industry and cost all involved more time and money.