From: Gerard C. Record

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Comments:

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Proposal: Regulation Z - Truth In Lending Act

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## Comments:

Please note that if AMCs are permitted set the market for fees paid to appraisers, the profession will continue to shrink to unmanageable levels. The fees being paid by AMCs (in many cases half of what they charge) to local appraisers leaves no room to train apprentices. The demands placed have grown while the fees have shrunk. There is no time or financial incentive available. The net result will be a dire shortage of appraisers in the foreseeable future. A quick check of any states roster of licensed trainees or assistants will bear this out. AMCs provide a service to the client over and above that of the appraiser. The appraiser's overhead has remained or increased. The costs of insurance, data services and other software requirements, not to mention auto expense has far outstripped the reduced fees being paid. None of these costs are borne by the AMCs, yet they continue to tout their "warranting" of services. The local appraiser is the warranter, all of the liability falls there.