

From: Jean M. McCarty
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: Jean M McCarty

Affiliation: Mississippi Coalition of Appraisers

Category of Affiliation: Educational

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

Re: Reasonable and Customary fees - Appraisal fees and Appraisal Management fees need to be set out separately on the HUD-1 Closing statement. Lenders or consumers need to bear the additional cost of the use of Appraisal Management Companies as AMC fees are an additional cost for consumer protection and should be applied as such. Reasonable and customary fees for appraiser fees should follow VA guidelines or follow the findings of a survey by an independent third party.