From: Lisa Freeman

Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act

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Comments:

As an appraiser who in has seen her fees cut in half. Then half to work for AMCs who still try to influence value. I do quite of few high value homes (1 million +). I am constantly having to justify my fees. If I didn't know the true cost they would take 60-70% of my fees. I would recommend that a full flat fee go to the appraiser and a service fee to the AMC] or Let lenders continue to order from the appraiser at the regular fees and establish a central review center. The AMC could change their business practice to this function. The appraiser would pay a fee to review company - \$75.00 for its certification of review and then it can be pass on to the lending institution. this also allows a standarize format for general information. There could be 3-4 main companies who handle the review. Do not forget to include LARGE appraisal staff companies. They have the same function as an AMC.!!!!!! THey do not pay salary or guarantee work this is the same as an AMC]