

From: Kevin A. Irvine  
Subject: Regulation Z -- Truth in Lending

---

Comments:

Date: Dec 22, 2010

Proposal: Regulation Z - Truth In Lending Act

Document ID: R-1394

Document Version: 1

Release Date: 10/18/2010

Name: Kevin A Irvine

Affiliation:

Category of Affiliation:

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

Concerning reasonable and customary fees for real estate appraisers- Fees today are below what they were 20 years ago. This is because, due to HVCC, the majority of appraisals are ordered through AMC's (Appraisal management companies) which charge the full or greater fee for the appraisal, then pass on a percentage to the appraiser. Because of the concentration of AMC's and the lenders that utilize them, appraisers do not have a lot of recourse as far as other work that would pay a reasonable fee. Also, these same AMC's demand a fast turn time for the appraisal despite the complexity or allowances for needed additional information. The appraisal industry is depressed due to these burdens and would appreciate a return to normal appraisal fees.