From: William C. Brush

Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act Document ID: R-1394 Document Version: 1 Release Date: 10/18/2010 Name: William C Brush Affiliation: Category of Affiliation: Address: City: State: Country: Zip: PostalCode:

Comments:

Regardless of what entity (Direct lender, AMC, Firewall), the appraiser should not be pressured by time contraints and or low fees to produce the desired product (appraisal). The appraiser is a professional with many hours and some many years of continuing education, license renewals and upgrades, costly e & o insurance, training data sources, multiple lisitng services form fillinf software and various other expenses to produce a credible appraisal. Therefore, the independent fee appraiser is due every penny of a reasonable and costomary fee. Most appraisers fees have not been raised in over ten years.