From: Christopher H. McCord

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: Christopher H McCord Affiliation: Category of Affiliation: Commercial Address: City: State: Country: Zip: PostalCode:

Comments:

I believe that one of the fundamental flaws with the AMC situation is that there is nothing in place to verify if an appraiser is qualified to appraise properties in a given area. Typically an AMC lets an appraiser give them a list of counties or zip codes in which they work. In my area I have seen appraisers that come from 125 miles away to work. It is unbeliveable to me that any appraiser can work that large an area. This along with the unrealistic demands for turn time combine to make this system ripe for failure of the one thing it was designed to do, protect the consumer for inaccurate valuations.