

From: Gerald Pirritano
Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 23, 2010

Proposal: Regulation Z - Truth In Lending Act

Document ID: R-1394

Document Version: 1

Release Date: 10/18/2010

Name: Gerald Pirritano

Affiliation:

Category of Affiliation: News Media

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

After 35+ years of appraising, I am not against AMCI however I am of the opinion that these companies place more pressure on appraisers than dealing directly with lenders. Pressure comes in the form of turn times, (accept and order within 4 hours, reassigned) call within 24 hours, return report within 24 hours of inspection. Not realistic turn times if quality work is required. Does one use mls photos for comparable sales, does one select comparable sales before inspecting the property, etc.