From: David Prior

Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act

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Name: David Prior Affiliation: None Category of Affiliation:

Address: City: State: Country: Zip:

PostalCode:

Comments:

I do not service single family residential but, knowing residential appraisers, I know that their fees are not realistic given the amount of work necessary to properly research and analyze data to provide a well-document and well-reasoned appraisal. Shortcuts are not whatever the appraisal assignment. To wit, AMC's should disclose the fee paid to everyone connected with an assignment A low fee will not disguise the extent of an appraiser's endeavor. The last thing this money market industry is a poor appraisal, reflecting on all appraisers, no matter what their specialty might be. Disclose, disclose, disclose.