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Comments:

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Proposal: Regulation Z - Truth In Lending Act

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Comments:

The AMC's have not solved the problem. They have just created different problems and the same problem in a more creative way. The problem with the lending industry is a human emotion - greed. If we don't address the reason for the fraud and corruption, it doesn't matter what you do - greed will drive people to find away around the new regulations. We need to allow the appraisers to determine what is the best method to solve an appraisal problem without direction from ACMC's or investors. Appraisers are in the market and know what is going on. Appraiser need to be paid a reasonable fee for their services and allowed to preform those services in a reasonable time period. The cheap and quick attitude has created substandard appraisals and thus part of the reason for the current economic down turn. If the lender would order the appraisal when they start the loan process, then there would be no need for quick. Now they wait until everything else has been done and then they order the appraisal and need it quick. As far as the fee, you get what you paid for.