From: Alex Nebelsky

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: Alex Nebelsky Affiliation: Category of Affiliation: Address: City: State: Country: Zip: PostalCode:

Comments:

I've been in the appraisal business for over 27 years and am so sorry to see its developing demise recently with the defacto forced use of AMCs. But since that is the state of the current situation at least leave us some dignity with earning a decent living by having market based fees. Market based fees are as simple as following the fee structure of FHA and VA appraisals. My suggestion out of this whole mess is to scrap the entire AMC system and have all appraisal ordering and reviews contracted out to appraisal review companies that would serve the same function but with a lot less regulation and cost. That's my two cents on AMCs. But please consider the FHA/VA fee sturcture. Thank you.