From: Anonymous

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: Anonymous

Affiliation:

Category of Affiliation:

Address: City: State: Country: Zip:

PostalCode:

Comments:

To Whom It May Concern: The fact that you have so few comments from my fellow appraiser's regarding appropriate fee's demonstrates the abysmal failure of the HVCC, in that it demonstrates the fear that many appraisers have from being dropped from AMC rosters for speaking out for fair pay for the work and expertise we supply for our appraisal talents. We've gone from the power that some unscrupulous Mortgage Brokers held over us to intimidate us in "meeting their value", to the power held by lending institutions and AMC's in either working for a fraction of what our talents our worth, or not receiving any work at all. Some lenders have a new form of "blacklisting", by requiring additional field reviews of appraisers they'd like to punish, which translates into AMC's not hiring those appraisers to avoid extra charges to their clients. To be fair, there are a few AMC's that have paid reasonable fee's to some appraisers, but my experience has shown that those AMC's are few, and once they have enough appraisers, the new appraiser is left out "in the cold". Typically, many AMC's place their appraisal assignments up for bid, with the lowest bidder receiving the assignment. Although the "customary and reasonable" fee portion of the Dodd-Frank Act is still far from a fair and equitable solution, it would be a step in the right direction in restoring some sense of decency and fairness to the Real Estate Appraiser profession. Thank you