From: Christ Appraisal Service, Ray Christ

Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act

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Comments:

Customary and Reasonable fees went by the boards with the advent of HVCC. Before HVCC many Banks routinely payed us \$355 per appraisal. Now those who have chosen to work with an AMC our fees from have dropped to @250.00 and the turn times have reamined the same as they were in a normel climate. (this falls was abnormal with rates below 5%). I have continued to average \$350 per appraisal from my other local lenders that are not using AMCs. AMCs still say "take it or leave it" with regard to their fees and pressure us to lower my fees. Banks not using AMCs recognize the complexities of my market and are willing to pay for the quality work I provide. Too bad I can't say the same about the AMCs who will continue to try to beat us down on fees so they can keep part of my fee as their own. Thank you, Ray Christ, Christ Appraisal Service