

From: Fred W. Coutchie
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: fred w coutchie

Affiliation:

Category of Affiliation:

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

AM's produce lower quality due to their low fee's. Appraiser's won't and cannot take the time to fully research the market. In addition, the reports are done to avoid underwriting flags and revisions, rather than address issues, or let alone provide and accurate value. The often silly underwriting rules give appear to be designed for very large one builder tracks that are not very old. Otherwise I don't find i can meet them. The worst and oldest requirement is that the subject must be average. I'm sure the foreclosure rate has been greatly increase by this requirement and the overstated values it has produced over the years.