From: Joe Schimpf

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: Joe Schimpf Affiliation: Category of Affiliation: Other Address: City: State: Country: Zip: PostalCode:

Comments:

Accountability is the first and foremost item that the Government has been futile in executing. Implementing additional rules and regulations without effective oversight is simply jibrish pushed into law that conveys a message that "we are doing what is good for the public". The AMC role in the appraisal industry is a non-effective measure that reduces fees (20 years ago when I got into this business fees have gone down) without effectively maintaining quality control based on the pressures placed on appraisers. I simply see this as another "band-aid" fix that does not allow appraiser's to establish fees not only based on mere inflation but what the constraints warrant for a fee that is comensurate with the job. The fees 20 years ago were pretty well standardized at \$300-\$350. The AMC's have cut these fees to an average of \$250- \$325. As the economy has colapsed, the only method to recoup fees is on a volume basis which can be considered comical at best. As a free market, one can see that the current fee structure has lost ground yet it costs more to produce a credible document- fuel costs- paper costs- and generally maintaining a standard of living that we, as appraisers, provide our families.