From: Alan

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: Alan M Todd

Affiliation: State-Cert. Res. Appraiser

Category of Affiliation: Other

Address: City: State: Country: Zip:

PostalCode:

## Comments:

My name is Alan Todd, State-Cert. Res. Appraiser. I have been an appraiser since 2003. When I started out as an appraiser, my average fee for a full appraisal in the Central Florida area was \$300. In 2003, most, if not all of my appraisal orders came from mortgage brokers, lenders or banks. For 2010, my average fee for full appraisals was \$225. In 2010, almost all of my appraisal orders came from AMC's. This is a \$75 decline in fee's per appraisal, for doing the same amount of work. In the past couple of years, there have been more and more regulations put on appraiser's. However, our fees have declined. As appraiser's, we are not as organized as the Real Estate Agents, nor do we have the money that the AMC's have. We need your help in making sure that our fees are comparable to the quality of the product that we are already producing. Thank you, Alan