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Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 26, 2010

Proposal: Regulation Z - Truth In Lending Act

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Comments:

I would like to humbly point out, that the Appraisal Management Companies (Hereon referred to as the AMC) are NOT agents of the appraiser, but direct agents of the Lender. Their compensation for services rendered should therefore be paid by the Lender, and should not be extracted from the fee that is indicated as the appraisal fee. Also, as with almost all other real estate related transactions, their fee should be a reasonable percentage of the service fee paid. The requirement within their service does not change drastically from order to order, as it may with the appraiser, depending on the complexity of the subject property. Therefore, it would be fairly reasonable if they were paid a standard non-varying percentage pegged to the fee the appraiser received. As of present, it would appear that they are able to 'skim' up to and above 50% of the appraisal fee, without shouldering the burden of risk or execution that is solely the appraisers.