



VIA USPS Express Mail

December 20, 2010

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, DC 20551

Re: Interim Final Rule Implementing Section 129E of the Truth in Lending Act

Dear Ms. Johnson:

This letter is in response to the request of the Board of Governors of the Federal Reserve System for public comment regarding the interim final rule amending Regulation Z (Truth in Lending), and implementing Section 129E of the Truth in Lending Act (TILA), which was enacted on July 21, 2010, as Section 1472 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

TAVMA is a non-profit professional organization headquartered in Pittsburgh, Pennsylvania that represents more than 50 companies engaged in the real estate settlement services industry. TAVMA promotes the settlement services industry by presenting its members' positions to government and media, protecting its members' rights to do business without unfair and anticompetitive legislation and regulations, and providing useful information about issues impacting the real estate settlement services industry and mortgage finance system in the United States.

TAVMA members share the concerns of the financial institutions regulatory agencies regarding appraisal independence and undue influence upon property valuations. Therefore, TAVMA supports the interim final rule as published in 12 CFR Part 226, Regulation Z; Docket No. R-1394, RIN AD-7100-56, Truth in Lending. It is a practical means to further the goals and responsibilities of the agencies to the public.

TAVMA appreciates the consideration that the FED gave to all of the various positions among industry participants on customary and reasonable fees, and the concerns of the appraisal management industry as described, in part, in our letter of August 25, 2010.

Sincerely,

Jeffrey M. Schurman
Executive Director