From: Anonymous

Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act

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Comments:

Any costs for the alleged "value added services" provided by AMCs must not continue to be deducted from appraisers' reasonable and customary fees. The lender is responsible so the lender should pay for the services, especially if the lender owns the AMC. Fees for mortgage appraisals are no longer driven by a free market due to the HVCC not allowing an appraiser to directly compete. The "mortgage" appraisal is managed and fees are now fixed by AMCs. Please use the VA, the Ala mode survey for determining what is reasonable and customary. Look at HUD-1s prior to HVCC. Look at what Fannie Mae and HUD pays for REO appraisals. My fee for a non-complex residential appraisal starts at \$350 and has not increased in more than five years.