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Comments:

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Proposal: Regulation Z - Truth In Lending Act
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Comments:

Definitions - A customary and reasonable fee: The fee the appraiser would charge if dealing directly with a lender, without interaction, diversion or impact from or by an AMC or other type of management or sales company. in other words, the fee you charged the bank before the AMC came along No need for any "study" or appraisal fee schedule. Appraisal fee: The fee received directly by the appraiser. This fee cannot include any charge or fee paid to, or received by, any AMC, or any third-party, as a transaction, processing, commission, management or other fee of similar intent. The appraisal fee must be identified on Line 804 of the HUD-1. This is the fee the borrower believes they are paying for the appraisal(s) and the fee paid to the appraiser or appraisal company. Customary and Reasonable: The fee for services that appraisers would charge if they were dealing directly with the lender without the use of an AMC, management, sales or other third-party. Other suggested text:

Any and all fees charged by the AMC cannot be part of the "appraisal fee" as disclosed on Line 804 of the HUD-1. The fee paid to the AMC, for their services, must be clearly delineated as an "appraiser management fee" and must be shown on a line separate from the appraisal fee. AMC fees may be shown on lines 808 through 811 or other lines as considered appropriate in disclosing their impact on transaction and/or borrowers funds. Any fees paid by appraisers to a lender or AMC, for processing, "signing-up" using AMC services, being on the AMC list, or "being an approved appraiser," must be disclosed separately on the HUD-1. No appraiser is allowed to give and no AMC is allowed to accept any portion of any appraisal fee for the right to receive an appraisal order. This prohibition applies to any fee paid prior to, during or after the close of a loan transaction or the extension of credit. Each and every AMC, will be charged a fee of no less than \$25.00 per year for every appraiser on their "approved list." The appraiser is prohibited from paying or reimbursing this fee to the AMC. This fee may only be paid by the AMC or lender. Alternative or additional text: The AMC is not allowed to receive a

discount from the appraiser. The AMC is not allowed to take any portion of the "Appraisal fee" charged to the borrower. The AMC must disclose their products and services to the borrower. If the AMC fee is for the borrowers benefit then the borrower is allowed to select the products and services and decide which AMC is the provider. Any and all fees charged by an AMC must be paid by the entity that engaged or designated the use of the AMC. Lenders, banks, credit unions or Realtor associations are prohibited from owning a controlling interest in, or influencing the operations of, an AMC. If a lender, bank, credit union, or Realtor association use the products and services of an AMC, then the Association is prohibited from owning any interest or stock in that AMC.

(reducing the possibility of steering and influence)