From: Philip J. Greim

Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act

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Regulation Z - Truth In Lending Act [R-1394] I am a certified residential appraiser in Pa, and after 12 years in the appraisal business I am now considering if I can continue as an appraiser. AMC's are forcing appraisers to work for contracted fees in order to receive assignments. Many appraisers are forced to "cut corners" to complete enough assignments to survive. It is ironic that it was an AMC that was at the root of the investigation, and now most lenders are using an AMC. I recently attended a CE class with 35 people and there was only 1 person that currently had a trainee. If fees continue at the current rate there will be very few people entering the appraisal field. The current fee structure makes it almost impossible to support a trainee. The basic premise of the HVCC is a good idea, however there are changes needed. Reasonable and customary fees for appraisers are one of the changes that need to be addressed. Thank You, Philip J. Greim