From: C.F. Conant

Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act

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Comments:

My comments are regarding my concerns about the appraisal profession in general. I'm very saddened to see my associates go under and lose the professions they have worked so hard to build. Some of my concerns are as follows: For one, the near impossibility for trainees to become accepted into the field. I had to let me trainee go because the AMC's I was working with would not accept them. I was even willing to take a small portion of the already miniscule fee to help him get a start in this industry. He is now seeking other types of employment elsewhere. For another, I have friends who are Licensed Appraisers and are unable to be accepted by most fee panels because they are not Certified. And the test for Certification is so difficult to pass I hear the failure rate is astronomically high. I have associates who were not able to study for the certification upgrade because the schools were not prepared with the updated material. When they complained to OREA, they were told, while

denying an extension, that they could have gone to Los Angeles to a school there where they could have studied. No matter that they lived in Northern California. Another associate is on the brink of retiring his license for all of the above and a lack of work. What can be done about that, I don't know. But the other points should be addressed by someone.