From: Susan D. McMillan

Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act

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Comments:

As an appraiser since 1992, I have observed a monumental decline in my business resulting from the implementation of HVCC and its aftermath. AMCs (likely owned by a major bank), have moved into place charging a borrower far more than an appraisal pre-2009, and paying an appraiser half their old fee. The appraisal in most cases is appointed to the lowest bidder with the fastest turn around time. It should be clear that the quality of the end product, under these circumstances, will be fast declining. And the need for "arms length transaction" has no credibility when banks are using their own "in house" AMCs. Unless I'm willing to work for \$10 and less an hour, (and still incur full liability), I am forced to see my livlihood slipping away. At the very least, reasonable and customary fees should revert to 2008 levels which are no mystery to uncover. Please consider what is happening to this industry in the bigger picture, and restore to my profession a fair compensation for service.