

From: Eric M Boggs  
Subject: Regulation Z -- Truth in Lending

---

Comments:

Date: Dec 13, 2010

Proposal: Regulation Z - Truth In Lending Act  
Document ID: R-1394  
Document Version: 1  
Release Date: 10/18/2010  
Name: Eric M Boggs  
Affiliation:  
Category of Affiliation:  
Address:  
City:  
State:  
Country: UNITED STATES  
Zip:  
PostalCode:

Comments:

Two years ago, those of us in the real estate appraisal profession lost most of our clients that were developed with great care and diligence over many years of hard work, and were forced into doing work only for AMC's (Appraisal Management Companies). Unfortunately, the AMC's only paid 70% of the fees that I was regularly charging before the implementation of the HVCC. While I applaud the appraisal independence portion of the HVCC, the fact that I MUST work at 70% of my former income is not fair or equitable. I ask that you not allow AMC fees into the matrix for calculating a 'fair and reasonable' fee. As you know, the banks OWN the AMC's, which are basically subsidiaries of these banks. The process allows the banks and their AMC's to force me to work at 70% of my normal fee and then they UPCHARGE the appraisal fee to the borrower (on the HUD-1 Statement) to 110-125% of my normal fee. It seems to me the new rate of 110%+ should be the new 'fair and reasonable' fee we can charge as that is what the AMC's are currently charging the borrower. The best solution is to allow the appraiser to collect the fee from the borrower, which allows the appraiser the freedom to render an unbiased opinion of value without any influence from the banks. That would also cut out the middleman, the AMC, and would be cheaper for the borrower. The ability to render an unbiased opinion of value should be paramount in any decision made regarding Reg Z. I thank you for allowing me to voice my comments and concerns regarding this new Regulation. Sincerely, Eric Boggs