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Comments:

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Comments:

Regulation of AMC's is long overdue. The AMC's add huge layers of unnecessary costs to the consumer to often create an inferior product. Generally speaking AMC's seek out the least experienced appraiser in a market in order to find someone that will meet their low fee and sometimes ridiculous turn around times. They take appraisals from low quality high volume appraisers and filter them through often unworkable filters in order to create a false sense of quality control. Appraisers are often forced to comply with unacceptable conditions in order to meet many AMC's "quality control" issues. All too often arbitrary rules impact the opinion of value of an appraisal. To many AMC's "quality control" is more like liability control. AMC's siphon off an unacceptable percentage of the fees without accepting any responsibility for the final product. I believe that the AMC should accept front line responsibility for the appraisal. If there are errors or fraud, the AMC should be responsible.

If the AMC had primary responsibility for the end product, they would choose the most qualified and experienced appraisers in the market. Now they seek out the most malleable. The bottom line is that AMC's do nothing to improve the quality of the product. Since the recent increase in the dominance of AMC's the consumer is paying higher fees and getting inferior products. Reasonable and customary fees are already established by the VA and independent studies from Alameda and many others. AMC fees are artificially too low in order to create exorbitant profits. The rule should also include severe penalties for non-payment. There are too many poorly managed AMC's in existence that are already unable or unwilling to pay appraisers in a timely manner. The bottom line is that AMC's do little to protect consumers, or appraisers. They are simply a profit generator for lenders and a method to add fees and costs to borrowers without performing any real work or accepting any real responsibility. AMC's should be fully responsible for the appraisals they procure. Appraisers should not have to indemnify AMC's and still have to comply

with often unworkable requirements.