

From: Bruce W. Lennick
Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 14, 2010

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

Comments:

I understand the need for regulation and for conformity in the appraisal process, but not every appraisal assignment fits neatly into the square peg of life. You rely on our judgement to make an informed decision to produce a credible report for that decision. Yet you allow an outsider(AMC's) to dictate the amount of work that it entails to produce this report. An appraisal in a metropolitan area with many comparables within 10 blocks does not equal the work of appraisers that have to travel around lakes, mountains and streams to produce the same report, yet they pay the same amount of money for either report. For instance, I recently completed a report that I literally put on 193 miles on vehicle for the same amount of money that I completed a report that I drove 54 miles. The way the system is now, I have no control over my costs to operate my business. As for bringing in new appraisers to take the place of the retiring appraisers, 1st there is no way that an experienced appraiser can take on a trainee and pay the trainee adequately with the current fees at are being offered by AMC's. 2nd, many of the orders that come to my office refuse to allow trainees to participate in the appraisal process. There are ways for the lenders to order appraisals without the use of AMC's, if the lender chooses to use this service, they should pay for that service, not the appraiser. The appraiser is contracted by the lender for the consumer for a service to be performed so that the lender can make a lending decision, only the local appraiser can know what the cost of his expenses will be to produce a credible report forthe clint. The AMC's claim that they can find the best appraisers to do that job, but if there is a conflict for which the lender needs to be notified, the lack of being able to directly communicate any concerns, has to go through the AMC, which in my experience, causes the whole system to breakdown and it usually causes more expense and time to everyone concerned. Another issue is tht the AMC's have virtually no knowledge of the assignment that they are asking the appraiser to complete. They ask us to do a job for a certain price before the appraiser actually knows what the scope of

work will be, the difficulty in producing a credible report or the distances that are necessary to complete the assignment, yet we are required to accept the assignment for the price offered or they move on to the next appraiser that is on the "approved list", so we must take a chance on taking the assignment, hoping that we are being paid enough for the work that needs to be performed. Refusing the work or asking for money just gets you moved down the "list". Appraisers have been the scapegoat for this housing debacle and for others in the past, and while there are some appraisers that bear some blame for illegal activity, they are a very small minority of the truly professional appraisers that are trying to do a good job for their clients. Bottom line is if AMC's are to be the middleman for the lenders and the appraiser's, the lenders should be paying for that service, the AMC's should be compelled to disclose the scope of work of the assignment so that a fair price can be applied and that communication between lender and appraiser should be direct if an issue should arise that needs to be answered before time and money are spent on the behalf of the consumer.