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Comments:

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Comments:

The process of ordering an appraisal for a financing transaction of any kind does not matter what type of laws or regulations are in place if in fact they will never be audited or policed by the all of these agencies that have and are putting these regulations in place. The laws or regulations are no better then how they are monitored reported or audited along with reporting sanctions and violations being administered. We saw how this applied when appraisers had to become licensed. This process has also failed us. Regulations will never take out the abuse or unethical behavior of any one person or company, simply stated for anyone that has been in the financing business for any length of time. Customary and reasonable fees as well as the time it takes to produce a credible report is under attack based on the fact that appraisers are expected to turn a assignment out in 48 hours or less for low fees, yet most of these loans take 30 or 40+ days before they are ever closed. Again why is such an important component of the financing transaction treated like it is the least important. In most cases a 2 day turn time from inspection can be met, but in most assignments it can not and should not and it is unreasonable. The appraiser should have control over what is reasonable time not an AMC who is only concerned with accounts receivable. The control that the very large AMC's have over an integral part of the lending process is nothing short of ludicrous. The amount of data, analysis and research required to produce a credible report is under attack by the industry that purports to support these changes. This whole process has left out just what customary and reasonable is and that it does not take a huge process to determine what this means across the country. Fees can be adequately measured by historical data. Reasonable time should be based on the time needed to produce a report that is not based on how to fill out the form and/or provide useless verbiage and conditions which are believed will alleviate a buy-back loan or to get it done in the shortest period of time. These comments are basic in nature without all of the rhetoric that is so overly abused. Simply and to the point. All facets of this industry

share in the blame for what has taken place. We need to enforce accountability, accountability, accountability.