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Subject: Regulation Z -- Truth in Lending

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Comments:

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November 17, 2010 Chairman Ben S. Bernanke Dear Chairman Bernanke, This letter is in regards to Title X I V (Sec 1400 Et Seg) of the Dodd-Frank Bill. Sec 1 4 7 2 of the act adds sec 129E, which refers to "Customary & Reasonable Fee" requirement. As a real estate appraiser for over 15 years, I am well aware of what a customary & reasonable fee for my service is. Before Appraisal Management Companies (A M C) basically took over the appraisal business a customary & reasonable fee for my services was \$375.00 to \$425.00 per residential appraisal. After the A M C became the predominant force in my business customary and reasonable was reduced to as little as \$200.00 but mostly \$250.00 to \$300.00 per residential appraisal. In addition appraisal orders are placed with the lowest bidder. This is unwise, considering the quality of work performed by some of these "lowest bidders". Also the fee to the borrower has increased expoentially because the A M C has to make money but provides no real benefit to the appraiser, lender, real estate agent or borrower. The H V C C has been somewhat of a benefit, in that it insulated the appraiser from any undue influences from the lender. However the A M C is brutal to work for, low fees, impossible turn times and increased fees to the consumer and in many instances, unreasonable expectations from individuals reviewing our work that has no conception of the appraisal process. Mister. Bernanke, I know you have a lot on your mind at this time, but I feel strongly that A M C are grinding appraisers to dust and providing little in return to the consumer. Please give the appraiser a thought when completing the next phase of this important legislation, specifically regarding resonable and customery fees. Fees should be consistent in the specific market areas where assignments are completed. The base fee from which the reasonable and customery fee is derived, the VA Fee Panel, at a mimimum should be upheld and allowed to take full effect. At best, the VA Fee Panel fees are less than many of us are accustomed to, but it

is imperative that we as appraisers do whatever is necessary to protect our profession. Sincerely, Bruce M. Higgason