

From: Martin Holloway
Subject: Regulation Z -- Truth in Lending

Comments:

RE Docket No. R- 1394 and RIN No. AD-7100-56

I am a Certified Residential/FHA Real Estate Appraiser practicing in Tucson, Arizona with nearly 10 years in the industry. Since the implementation and recent sunseting of HVCC and the arrival of the numerous Appraisal Management Companies (AMC's) My workload has doubled but my pay has been cut in half. The time spent meeting differing AMC criteria (each AMC has it's own numerous redundancies and peculiarities) as well as the additional commentary requirements for the same are increasing and the fees continue to decline. It seems to make no difference to the AMC whether I have an order in a cookie-cutter subdivision or whether its a 7500 sq. ft custom home on 11 acres with a guest house and horse facilities, they all want to pay the same low fee.

The AMC's need to be sunsetted. They serve no useful purpose and they slow down the entire process. For instance, if I am unable to contact my entry contact, I have to notify the AMC, who then notifies the lender, who then notifies the AMC, which then finally gets back to me. By the time I am able to make contact, everyone is upset and the inspection hasn't even been done yet. In addition, if and/or when we get pressure from AMC's for turn times, values, lowering our fees, etc, etc, the appraiser still has no one to file a complaint with!!

Please consider licensing and certification of the lenders and the lender's agents with penalties commensurate with any and all illegal activities and/or pressures. Please also reinstate direct communication between lenders and appraisers and enable the appraisers to have a place to go to file a complaint if and/or when they are being pressured. The scrupulous and above-board lenders and appraisers will once again thrive, and the illegal and unscrupulous entities will be weeded out.

Customary and Reasonable fees were established well before the arrival of the plethora of AMC's.

All that the AMC's have managed to do is to take money out of the appraisers pockets for a slow and redundant non-service. Please spell out specifically what is meant by Customary and Reasonable. The VA is a great source for this as well as those fee schedule averages which precipitated the onset of the AMC monster. There are also a number of surveys from appraisers which detail what is customary and reasonable.

Please consider these suggestions. The appraiser is the only entity in the typical real estate transaction who does not have a vested monetary interest in that transaction and the only one who is qualified to make a valid and defensible market value analysis. Please keep the appraiser independent. Thank You.

Sincerely,
Martin G. Holloway