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Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 22, 2010

Proposal: Regulation Z - Truth In Lending Act

Document ID: R-1394

Document Version: 1

Release Date: 10/18/2010

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Category of Affiliation: Other

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This communication is in support of the language within the Dodd-Frank Wall Street Reform and Consumer Protection Act that refers to the "Customary and Reasonable Fees" for appraisers. This part of the act is scheduled to be implemented on April 1, 2011. However, this "Interim Final Rule" has language that concerns appraisers in regard to whether the provisions related to appraisal fees will be truly enacted. It is important to recognize that there is a direct correlation between appraisal fees and appraisal practices which should be of great concern to everyone. The current fees offered by appraisal management companies are too low for appraisers (those who stay in business) to maintain good appraisal practices. Low fees will encourage "shortcuts" and result in poor valuation practices. The intent of the Home Valuation Code of Conduct, which inspired broad use of the low paying appraisal management companies, was to elevate appraisal practices and increase appraiser credibility and consumer confidence. However, the unintended consequence of broad use of low paying appraisal management companies has had the opposite result of the intent. Currently appraisal assignments are often completed by appraisers who previously received very little work due to deficient appraisal practices. Appraisal management companies are currently awarding appraisal assignments to those appraiser's who are willing to accept the lowest fees with predictable results. A high level of education, training, experience and expertise is necessary to produce credible appraisal reports. A non-complex single family residential appraisal assignment requires a minimum of eight hours to complete. Complex residential properties may require forty hours or more. Additionally, there are considerable costs and expenses associated with maintaining a professional appraisal practice. Some of the costs and expenses include; Hardware & capital equipment; Annual appraisal software fees; Annual E & O Insurance; Annual continuing education; Annual telephone & internet connectivity and fuel, Annual medical & dental insurance, totaling approximately \$27,000 in my case. Please take great care in your consideration of the potential impact of

appraisal fees on the financial industry and the economy as a whole. Regards,
Julie Speakes Certified Residential Real Estate Appraiser Speakes Appraisal
Service