

From: J. Carlson
Proposal: 1417 (RIN 7100-AD75) Reg Z - Mortgage Repayment Standards
Subject: Reg. Z

Comments:

Date: Jul 16, 2011

Proposal: Regulation Z - Truth In Lending Act
Document ID: R-1394
Document Version: 1
Release Date: 10/18/2010
Name: J. Carlson

Comments:

Most of the AMC's I work with give work to the lowest bidder. This is why I have very little work because I refuse to give my skills away for what often turns out to be minimum wage, sometimes less, sometimes more, usually close to break even. I am a seasoned and experienced appraiser in my market area and have earned the right to charge a reasonable fee commensurate with the amount of work the assignment involves. The lowest bidder will more than likely not do as thorough of a job as I will do. These companies are going to learn the hard way that you get what you pay for. We are in the mess we are in now because of poor practices. The way things are going, with the assignment going to the lowest bidder, we are headed for more of the same. At one point, I thought there was something in the law that said that there would be a "rotation" of appraisers with the work load equally distributed. This is certainly not the case when I continually receive calls asking for my best fee and turn time. Not really a "fair" or "reasonable" practice. Pay good appraisers what they are worth with the expectation that the product they deliver will be of good quality. This is just plain common sense. Good appraisers are disgusted with the current state of affairs and many are leaving the business. This will leave the lesser experienced appraisers to complete most of the work. This seem like a very poor plan for the future. Finally, "customary and reasonable" does not mean making far less per assignment than I did 10 years ago. Common sense (which most people consider "reasonable") would dictate that fees should, if anything, have gone up along with the workload and adherence to new expectations (i.e., increased lender and FNMA specific guidelines).