

From: Lambert Appraisal Services, Joseph A. Lambert
Subject: Regulation Z -- Truth in Lending

Comments:

Hello,

I'm a certified appraiser, and have been in the profession for 7 years. I have read the information on the IFR and although I understand that

the governing body cannot set fees for the market, I am baffled as to why a standard of fees is not made reference to in the legislation. From what I understand the ruling is very broad and thereby open for interpretation. This does not really help appraisers in the profession right now who have made sacrifices just to stay in the business given the current economy and other conditions regarding lower fees from many AMC's. Unfortunately, our free market was stripped away from us with the implementation of the HVCC.

The HVCC did not take into account the possibility of the new "middleman" taking advantage of the appraisers who are a vital and important part of the real estate settlement process. Many appraisers have chosen to leave the business because they cannot afford to stay above water given the current conditions. Our overhead has not declined and as a matter of fact they have increased. So why should our fees be decreased? Unfortunately, appraisers have become the "fall guy" for the predicament our country is now experiencing which is really due to a lack of oversight from the government and the implementation of legislation allowing large corporate industries to merge together creating an unbalance in the markets to the detriment of the country and taxpayers in particular.

Regardless, the new legislation at a minimum should reference an established standard for the "customary and reasonable" fees referenced in the IFR.

As an appraiser, I am now forced to accept \$200 dollar fees from AMC's for a standard single family residence. Before the HVCC the fee was never lower than \$350. Now, the VA fee schedule which has been suggested as a standard is an accurate depiction of what appraisal fees should be in many markets not accounting for a variance due to the complexity of the assignment, travel distance, location, value, etc. The fee for a SFR in my area is \$400 as referenced in the VA schedule. Hopefully, the opinions of myself and other appraisers will be given due consideration in the final reconciliation of the IFR.

Joseph A. Lambert
Lambert Appraisal Services