

From: Anonymous  
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I am writing anonymously as an appraiser who does not wish to be blacklisted by the AMC's (appraisal management co's) and banks that own them for daring to comment on the facts. Many of the banks I established business relationships with have gone the AMC route. The AMC's are ruining the quality of the appraisal process. The AMC's main goals are low fee and fast turn-time. I have documented numerous instances of this by many different AMCs and shall provide evidence if necessary. During the extremely busy times that we are currently experiencing, I have had assignments taken away because the AMC insists on 3-day turn time. Are you kidding? What quality can be expected? The lenders and title co's are taking 2-3 months to close loans and they need appraisals in 3 days? It's a joke. When dealing directly with these lenders in past refi-booms, 2-3 weeks was customary turn-time given high-volume. I have seen appraisers come from 200 miles and load up on assignments on the cheap in areas they don't have competence in. The AMC's don't care. The AMCs want more non-essential commentary, more comps, and have more requirements. They won't pay extra for them. What bank doesn't charge a fee for everything? Appraiser's free trade and right to do business have been decimated because of lender/bank greed, ill-conceived liberal loan products, and outright fraud and incompetence. There no doubt needs to be a separation to avoid value pushing lenders threatening appraisers. It should not, however, mean the appraiser cannot run his/her own business and earn what they used to. Appraisers cannot even raise their fee or they will lose work to the newly licensed, inexperienced appraiser down the street who has hit the jackpot under this scenario. What other aspect of the mortgage business has had their ability to do business taken away by bank incompetence? The AMC tells appraisers not to discuss fees with the borrowers. Why? Because the borrower and the appraiser

are paying for the AMC service. I have had borrowers ask me why the appraisal fee is \$550.00 when the last time they refinanced 3 years ago it was only \$300.00. I explain to them I used to charge \$300.00 but now am being paid \$240.00. Isn't it ironic that the incompetent banks were made to go the AMC route, yet don't want to pay the fee themselves for a service they have to or want to use. What other business orders a service and then charges the cost of the service to another service provider for the pleasure of doing business with them? When a person needs a plumber, does the plumber pay the homeowner a fee for coming to their house? Why should the appraiser and borrower pay the AMC and lender? The lender and AMC need the appraisal service!! The borrower and appraiser should not be getting slammed. The bank should pay the AMC directly as a business expense. The commentary by TAVMA and other pro-AMC organizations is ridiculous. They have a vested interest in keeping their profit intact on the back of the appraiser and the borrower. They do not want to pay the appraiser what the customary fee for an appraisal is because then they would turn around and charge the borrower \$700.00 for the appraisal. The VA has perfectly good fee and timeliness requirements that are established nationwide and can be easily implemented. The question TAVMA, banks, and AMC's should have to answer is this: What did you pay the appraiser directly before the HVCC and the advent of the AMCs? The answer is; the customary and reasonable fee established by and formerly paid to the appraiser as an independent business!! The proof is in the invoices they have on file. Of course, this may be too simple for these folks to understand. It's obvious they would rather engage in all kinds of legalese and other nonsense available for reading in this forum. It's unfortunate that the bank and AMC lobbies have time and staff to inundate this forum with their selfish views rather than being of service to people who need loans. The majority of appraisers are currently working nearly 24-7 to complete appraisals in unrealistic time frames. Most appraisers don't have the time to provide their commentary on this site, and certainly cannot afford to hire people to do it based on the cut in fees they have experienced. It is, however, time worth taking. Maybe it's fortunate an AMC took 3 orders away from me last week because I could not complete them in 3-4 days. This has given me the time to present realistic views. I also know that I can speak for every competent, experienced appraiser I know who feels exactly the same way I do. In closing, I would hope that quality appraisals are given the highest consideration. With quality comes customary and reasonable fees as established by the appraiser, VA, etc. With so many bank failures and continuing foreclosures, quality should be the main focus, not cheap, fast appraisals. Thank you for providing this forum and taking into account the facts I have presented. There should be no lengthy delays in the establishment of customary and reasonable fees/turn times. Anonymous appraiser with 23 years experience.