

From: The Appraisal Shop, LLC, Brent McSpadden
Subject: Regulation Z -- Truth in Lending

Comments:

After much thought about the comment I sent below, I am not sure mandating a higher fee is the answer to the problem. The problem has direct correlation to the policing of the appraisals completed. I speak to colleague appraisers on a daily basis. They tell me how they cut corners to meet today's demanding turn times and low fees. Many do not personally shoot comparable photos and use photos from MLS in reports. This does not allow them to know of any external influence a property may have. This allows them to save time and car expense. Many self create the information for the neighborhood trends rather than doing the difficult research work to provide the actual information. This is not the information that should be provided to the lender or ultimately the government backing agency. Many use the same generic market trends on every report rather taking the time to research the correct information.

If these items, along with other shortcuts appraisers take can be properly policed, and the appraisers cheating the system to save time and money on developing reports can be stopped, fees will correct themselves. Thank you for your time.

As a hard working and taxpaying self employed real property appraiser, I would like to voice my opinion on the inconsistency of the wording in the interim ruling on reasonable and customary appraiser fees. Since the HVCC ruling has been placed in effect, appraisers have been denied the ability to set reasonable fees in a competitive market. As an appraiser with 10 years experience, it is not fair to say someone with 2 years experience has the same ability to complete a competent report, yet we are currently paid the exact same fee. When I was inexperienced, I would accept any assignment that paid. Through the years, I was able to use my experience to appraise more difficult properties at higher fees. Today I appraise more difficult properties at the same fee as the new appraiser getting easier assignments. It is not fair to be able to competitively bid on assignments and rather have AMC's throw orders at us demanding quick turn and the same fee regardless of the difficulty of the assignment. If we decline a certain percentage of assignments, they quit using us.

Bottom line, every appraisal assignment should not have the same low fee. We should not be threatened with our livelihood on whether or not to accept extremely difficult assignments at fees for too low to complete the assignments competently.

Thank you for listening, please correct this problem, prior to all the experienced appraiser changing profession. If this happens, the real estate market will be in trouble for many future years, possible forever to rebuild a network of appraisers who actual know how to value properties.

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