From: Bill A Barnes

Subject: Regulation Z -- Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act Document ID: R-1394 Document Version: 1 Release Date: 10/18/2010 Name: Bill A Barnes, SRA Affiliation: General Certified Appraiser Category of Affiliation: Address: City: State: Country: UNITED STATES Zip: PostalCode:

Comments:

Lenders cannot make solid loans without the services of a professional valuation expert to assess the real estate collateral. The United States economy is in its 3rd year of an economic catastrophe due to poor regulation and supervision of the mortgage and finance industry. Lenders have wrongfully shifted the estimated \$200 loan processing expenses related to appraisal review and ordering over to AMC's which then deduct all or most of this cost from the appraiser in the form of reduced fees. The new lender "Scope of Work" requirements have increased the amount of time required to complete the standard appraisal. Now we have 1980's fees with 2010 expenses. Meanwhile, VA fees are in the \$450 range while the typical AMC fee for the same work requirement is in the \$225-\$300 range. Reasonable and Customary fees in the Phoenix, Arizona market area should be the same \$450 fee for a residential appraisal. The solution is for the lender to pay the AMC \$650 for the typical appraisal order (\$450 to the appraiser and \$200 to the AMC for doing the lenders work of appraisal ordering and review).