

From: Colleen C. Patterson
Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 14, 2010

Proposal: Regulation Z - Truth In Lending Act
Document ID: R-1394
Document Version: 1
Release Date: 10/18/2010
Name: Colleen C Patterson
Affiliation: Certified Residential Real Estate Appraiser
Category of Affiliation: Other
Address:
City:
State:
Country:
Zip:
PostalCode:

Comments:

I am a Certified Residential Real Estate Appraiser of 24 years' experience in 4 states. My experience with AMCs? I no longer work for them. I spent more time wading through their complex, idiosyncratic computer systems, convoluted, inept, amateur review processes than I did determining value. Almost without exception their primary concern was weasling fees. Then fast turnaround. Quality? I don't think they know or care. As the complexity, risk and time required in doing a competent appraisal escalates, the AMCs hassle to reduce my standard fee so they can pocket more simply because they control the business. I do what I have always been good at doing in this business - I just say "no". Is this pushing experienced quality appraisers out of this business? You can bet on it. Is it leaving more of the inexperienced, desperate, appraisers to take their orders? You bet. Is it discouraging new quality people from training? That is certain. One comment on loan officers regretting the passing of pre appraisal estimate of valuation by an appraiser to save them and their clients time and money: sorry, it was a bad, bad, practice and I won't belabor the obvious. Never did I have a loan officer then or now suggest that an appraiser be paid for such preliminary research and that its outcome be in writing, with any fee applying to completion if that is what follows. Nor do I hear anyone suggesting a return to lender held mortgages where they take on the risks of their loans. Want to see meticulous appraising and support and remuneration to a skilled appraiser? I was on staff of the leading portfolio lender in the early 90's. Far from being encouraged to push anything through to make a fast, short term buck, we were intelligently hired, reviewed and rewarded. Making mortgages was their business and their risk- taking ensured it was a rationally considered one. It was a momentary and fleeting pleasure in my appraising life, and an amazingly successful one. My employer was the leading, most profitable S• of its time. Rules changed, it changed, sold again and again, no longer a portfolio lender, it was considered a liability when last acquired, and now? It no longer exists.