

From: Jones Real Estate Appraisal, Bryan Jones
Subject: Regulation Z -- Truth in Lending

Comments:

This is response to the Interim Final Rule, Truth in Lending, Docket No, R-1294,

I am a second generation, certified appraiser, that has completed over 4,500 appraisal assignments. I would like to express my experience regarding the changes in the appraisal industry over the last 5 years. The HVCC regulations has been both positive and negative for our business. Positive in that we no longer have to deal with the relentless pressure from, mortgage brokers in particular, to inflate appraisal values. This is a huge relief for us that we can now operate more independently without undue influence.

The negative side is that we now receive orders, mostly from AMC's, who have slashed appraisal fees, sometimes more than 50 percent, from what they were before the HVCC regulations were in place. A typical appraisal fee, for a single family home in this area, non complex is around \$400 to \$450. Just today, I have received several emails from national AMC's for similar assignments, with fees of between \$175 and \$300. These reduced fees and it will / has dramatically hurt the quality of the assignments and the profession as a whole. As a result of these fees, many AMC's are not choosing the local appraisal expert, but an lower licensed appraiser from outside of the area. I can't even tell you how many stories I have heard from listing agents and home owners about how some appraiser, based two hours away, came out to do the assignment. I have seen many of these low quality appraisals from out of town appraisers and in one work they are terrible. It is blatantly obvious when reviewing these report that out of town appraisers lack the experience and competency to complete a valuation in this market area. Most homeowners are now so afraid of getting stuck with an out of town appraiser, the first question they ask me is "where are you located".

Using "customary and reasonable" fees is a good solution that would force AMC's or creditors to use the more experienced appraisers. It would also a help make real estate appraisal a more attractive profession. As it is now, there are virtually no new appraisers entering the field. Why you would it takes years to become licensed and not be able to make a living in this profession.

I do believe that real estate appraisers provide a crucial role in the lending industry. Please help continue to protect our profession.

Thanks for listening.

Best,

Bryan Jones

JONES REAL ESTATE APPRAISAL