

From: Barkalow Appraisals, Ltd, Barkalow Appraisals
Subject: Regulation Z -- Truth in Lending

Comments:

I support the comments submitted by NAIFA, AO, ASFMRA, and ASA (professional appraisal associations) regarding the above referenced docket #, the Interim Final Rule amending Regulation Z

As a residential appraiser, I am particularly concerned about reasonable AND customary fees. My experience with AMCs is that an AMC asks several questions when they select an appraiser: do you have E&O, how cheaply can you work, and how quickly can you get the job done? There is no transparency for the consumer, who believes an appraiser receives the entire \$500 or \$600 they are charged for the appraisal, and the reports are nitpicked by non-appraisers, who many times seem determined to have the appraiser create "acceptable" comparables to ensure the loan is approved. We need fees based on complexity of the assignment, scope of work, qualifications and experience of the appraiser, and location, and those fees should be based on non-AMC surveys. This needs to be done, to ensure public trust, as well as competently and ethically completed appraisal assignments.

The HUD-1 should be revised, to list the fee paid to the appraiser separately from the AMC/processing fees. Many lenders have abdicated their responsibilities in the loan process, passing appraisal fees through directly to AMCs, without regard for what percent of the fee is kept by AMCs, so they can call and email appraisers countless times each day, wanting to know how soon an appraisal report will be submitted.

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