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Comments:

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Comments:

To whom it may concern: I have been in the real estate appraisal industry since 6/1966 and have owned my own business since 1993, I am a State Certified Residential Appraiser. AMC's have completely ruined this profession. AMC's work for the lender/bank and as such should collect their fee from their client, not their sub-contractor, the appraiser. Although an appraiser may be on the AMC's "list" to provide appraisal services that appraiser will NOT get any assignments UNLESS they agree to the very lowest price the AMC will pay. That way the AMC makes money on both ends. I refuse to do that as well as their unreasonable turn times for a report. As we all know, in the end you get what you pay for! Customary and Reasonable appraisal fees should NOT be based on any AMC fees. However, fees that have NOT gone through an AMC should all be considered. I have read that the VA fees may be considered as a basis for the Customary and Reasonable fee schedule. I do not know what those fees are but, I would say that "other" schedules be considered as well, as long as they are in no way connected to any AMC. All of this problem started with the HVCC. Not all of the HVCC is bad, just most of it. Appraiser independence from the lender/bank is a critical part of the HVCC that was long overdue. That being said AMC's jumped on the band wagon and are completely unregulated, unlicensed, no insurance requirement (since they ride on the coattail of the appraisers E & O insurance). They use under qualified appraisers that agree to do the assignments for such a reduced fee it has driven knowledgeable appraisers out of the business who would not lower their standards or reduce their fees to compete against the unqualified. This MUST be stopped. AMC's must be made to charge their client the lender/bank for their services and not take it from the appraisers fee. In the end The Consumer is the one being damaged by all of this. I personally do not do any work for any AMC because of their attitude and tactics. I implore you to adopt a Customary and Reasonable fee schedule for appraisers that ALL lenders/banks and AMC's MUST follow. Thank you for this opportunity to comment on this matter. David J Bramuchi Bramuchi Appraisals, LLC