

From: Charles A. Raymer  
Subject: Regulation Z -- Truth in Lending

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Comments:

September 9, 2010

Sandra F. Braunstein  
Director, Division of Community and Consumer Affairs  
Board of Governors of the Federal Reserve System  
20th Street and Constitution Avenue NW  
Washington, DC 20551

Dear Ms. Braunstein,

I am writing you to express concern on the issue of "reasonable and customary" fees for appraisers. With almost 20 years in the appraisal business, I am extremely disappointed with what appraisal management companies have done to this industry. It has become increasingly difficult to earn a living and raise a family with the appraisal fees that they offer.

AMC's have set fees through collusion. They did not compete in the open market. They have gained their position in the industry through intimidation and threats towards appraisers. If you don't work for very low fees, they will not send you business. So in an effort to feed their families, many appraisers have had no choice but to work for less. Many good appraisers have left the business over the past few years pursuing a better way to provide for their families. Some of us have had to fire support staff in an effort to simply stay in business. AMC's have created an environment where new, inexperienced appraisers are completing most of their appraisals. Hence, the appraisal product is lacking the good judgment and knowledge of appraisers with considerable experience in the field.

I am very aware that TAVMA is fighting hard to reduce fees for appraisals, and they do have a loud voice. I urge you to consider the following when deciding what is reasonable and customary. First, VA and FHA already have a base-line for what is reasonable and customary in every geographical area and their fees are reasonable and customary in my opinion. Secondly, there are several entities that are conducting broad surveys, such as workingre.com and alamode software. If you review either of these sources, you will clearly see that what AMC's promote as a "reasonable and customary" fee is not at all accurate and has not been determined by the market.

I appreciate your consideration in this matter. I know that TAVMA is working hard to promote their self-interest. While appraisers may not have as loud of a voice as TAVMA, we do need your help in preserving our profession, and ensuring that good, experienced appraisers are able to stay in business and provide accurate property valuations.

Kindest Regards,  
Charles A. Raymer