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Subject: Regulation Z -- Truth in Lending

Comments:

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Comments:

Regarding Title XIV of the Dodd-Frank Act Subtitle F: The people who have created this legislation or have made comments on this proposal seem to have forgotten that Licensed Appraisers are no longer able to be an independent part of the lenders HVCC lists. This has forced all Licensed Appraisers to forfeit an extremely large portion of their "customary fee" to either a Certified Appraiser willing to act as a supervisor, or an Appraisal Management Company. Making "customary fee" legislation will only benefit the AMC's!! The HVCC legislation has put MANY Licensed Appraisers out of business, adding to the unemployment and foreclosure crisis in America. It is my belief, as well as many others who are forced to now PAY someone else to have their work filtered through, that Licensed Appraisers are more than qualified to comply with the rules and regulations as promulgated by their respective State, FIRREA, USPAP, Appraisal Foundation, etc. It is unfair that the ethical, hard working appraisers, such as myself and many thousands of others, are now facing losing everything over some unethical loan brokers and appraisers. Licensed Appraisers have lost their independence, income, and quality of life, resulting in profit making for Appraisal Management Companies. Elected officials are hired to be the voice of the people. For the People, by the People. My hopes are that this comment is "heard" and maybe that a little more time and effort is given to creating legislation that does some good for all parties involved; It is not just the banks that have a financial interest in it. I propose that all State Licensed Appraisers be allowed to let their track record speak for themselves, and be able to be considered for being added to ALL banks HVCC lists for Federally Funded Transactions, (Conventional, Rural, Fanny and Freddie, etc Home Loans) as we were in the past. The unethical Appraisers who have found trouble in the past should NOT be eligible. Any Appraiser who has been added to a "Ineligible Appraiser List" or "Blacklist", or have been fined by their Department of Commerce for a violation within their standard of practice would not be eligible. At least then we could keep the HVCC list and the barrier between the broker/lender and more ethical, impartial appraisers

could keep their jobs. Respectfully Submitted, Ryan Edick Edick Valuation Services