

From: Jack Skees  
Subject: Regulation Z -- Truth in Lending

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Comments:

As a certified residential appraiser in the Commonwealth of Kentucky I support the Dodd-Frank Wall Street Reform and Consumer Protection Act as it applies to residential appraisals. I also support using the VA Fee Schedule as customary and reasonable fee, till at least a total independent survey can be established that accurately reflects the customary appraisal fees for specific areas of the country. I am on the VA Appraisal Panel as well as doing work for several of the appraisal management companies. It has been my experience that VA makes a concerted effort to survey appraisal fees paid in each area in establishing their current fee structures. The fee structure they announce periodically is the fee we charge not the minimum or maximum as had been portrayed by some special interest groups. I have found their fees to be reasonable for our area. I have also found that some of the appraisal management companies pay to the appraiser significantly lower appraisal fees than what is typical in the area. They also prohibit any discussion with the Lender or the Borrower of what our fee structure is with the management company. I have found out that the reason in most cases is because the appraisal fee they charge the borrower is sometimes as much as twice the amount that the appraiser was paid. They also have taken the position that if you don't like our fee then we will not give you any work. Fortunately for me we have had enough appraisal activity in our market that I do not have to accept their fees and am able to obtain appraisal fees that are more customary in our market. If left up to the appraisal management companies they would definitely dictate much lower fees (the higher the fee paid to the appraiser the less their profit margin). It has been my experience that the more experienced and knowledgeable appraisers do not want to deal with appraisal management companies because of their fee structures. I highly recommend that to help eliminate any lender pressure on the appraisers that the Federal Reserve adopt the VA Fee structure as minimum for customary and reasonable appraisal fee.

Sincerely

Jack Skees