

From: Ashland Appraisal, Christine Howard  
Subject: Regulation Z -- Truth in Lending

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Comments:

Dear Board of Governors of the Federal Reserve,

I would like to take the opportunity to submit comments regarding the Appraiser Independence Section 1472 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

I am a certified Real Estate Appraiser in Kentucky operating a one person business providing appraisal services. I do believe that it is imperative that legislation be enacted for appraisers to be paid customary and reasonable fees not set by AMCs and that the VA fee schedule does reflect what is reasonable and customary. Since the HVCC was implemented there has been a definite decline in fees being paid to appraisers by AMCs. Often an appraisal is assigned based on who will accept the lowest fee rather than on competency. I truly believe that if fees were not an issue that the more qualified or better appraiser would be chosen. A more effective approach would be for a separation of fees paid to the AMC and appraiser. Fees would not be an issue if the AMC was paid a separate fee for their services and could not take part of the appraisers fee. I have had several complaints by consumers for the high appraisal fee when in fact the amount also included what was to be paid to the AMC. The consumers have no idea what services an AMC is providing or why they have to pay for it.

AMCs provide a varying degree of service, some of which I feel are not properly regulated. Most employees of AMCs who review my work are often not even qualified to do so. Often times an appraiser is required to provide certain verbiage in the report or make baseless changes due to ignorance of the appraisal process. I am very concerned that there is no licensing or oversight of these companies or their employees. There should be professional standards and ethics for AMC's since they provide a service that effects a federally related transaction. In my honest opinion the use of AMC's do nothing more than add to the consumers costs of acquiring a loan and degrade the appraisal profession.

Thank you for your time.

Sincerely,

Christine Howard

Ashland Appraisal