

From: Hilton Appraisals llc, Shari Hilton
Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 21, 2010

Proposal: Regulation Z - Truth In Lending Act

Document ID: R-1394

Document Version: 1

Release Date: 10/18/2010

Name: Shari Hilton

Affiliation: Hilton Appraisals llc

Category of Affiliation:

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

Independent fee appraisers, became such because of independence. We operate in the free market as business owners. We set our own prices and collect our own fees. We did not need a third party of glorified order takers, creating a FALSE business and profiting off our backs. In the mortgage process. The appraiser makes the least and has the most responsibility. The appraisers are not the reason for the housing mess. If i am making \$300-350 per single house, working 5-8hrs per appraisal, tell me where is the margin if any, I have to give anyone anything, especially when the very same orders we have taken from our clients ourselves. AMC have not added any value to my business. I do not need them for anything, that includes marketing, advertising or billing. In fact my business is significatly down due to the fact that my client base, which thru good work, has consistent used my services now cannot reach me dirctly. What business does not have direct access to their own clients, which they have cultivated. This is insane. Secondly, It is unreasonable to ask appraisers to do any more work for the same money. We are not the mortgage industries or AMC's lap dog. Let the mortgage companies pay for any addition services they require. Any other industry operates that way. Common sense has seemingly gone out the window concerning these issues. Our livelihood's have been seriously affected by this situation. However, the same people responsible for the housing mess, just revamped and formed AMCs. If in an investigation the school of thought is to "follow the money" to get at the root of a problem, well the money does not nor has every lead back to appraisers en mass. We have enough hurdles and regulation to follow. Leave us in peace to make a decent living.