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Comments:

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You have task in front of you that appears to be difficult to define. From an appraisers perspective in a rural area of the northern great planes, I don't see much of a change for me. My fees are my fees, they are based on the scope of work for an assignment in a given area. I can only speak on behalf of what is happening in my own trade area. In this area our fees are most likely twice that of major metropolitan areas. I believe the Dodd Frank Act was mostly intended for those areas most impacted by the national housing crises, where AMC's can and do have an effect on appraisal fees, and in those areas were appraisers are starving for work. What I do not want to see is those areas effecting my business. Customary and reasonable in Las Vegas NV. Is not the same as customary and reasonable in Minot ND. Please remember the scope of work for the appraiser changes with availability of information. Some states and some areas do not have this information at their finger tips and it must be acquired by other means that are very time consuming therefore the scope of work for Minot ND is not the same as the scope of work 50 miles away in Westhope ND. The fees posted by the VA are considered low in comparison to our regular fees in this trade area. The VA's approach to one size fits all does not work for everyone. It is my hope that appraisers establish fees based on the scope of work and time spent completing an assignment. If it takes 8 hours of work then the appraiser should get paid accordingly. When appraisers are forced to cut corners to make a decent living is when the quality of ethics, integrity, and conduct declines and the consumer and lending industry as well as the rest of us suffer for it. It is my belief that the overwhelming majority of Certified Appraisers would prefer to do less volume with higher compensation and higher quality than have to rely on volume with lower quality in order to put food on the table. I believe The Appraisal Foundation and all of the subsequent committees have and are doing their best to establish rules, regulations, ethics and standards to make the appraising profession into a highly professionalize trade. With that comes compensation that is reflective of the responsibilities placed on those in that profession. It is my belief

that the fees will have to increase nationwide as we move forward through the housing issues. Remember lower fees and pressure of higher volume FORCE some appraisers to make poor and unethical decisions.