From: Christian

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Comments:

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Proposal: Regulation Z - Truth In Lending Act

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Name: Christian Affiliation:

Category of Affiliation:

Address: City: State: Country: Zip:

PostalCode:

Comments:

I work with many AmC's. Some are good, real good, some are bad. Some are professional and some appear to work out of someones garage. I have encountered report reviewers that have NO clue about appraising, yet they tell me what and how they want me to correct a report. To use comps that are not comps, just so it will fullfill their guidelines. I sometime use a lousy comp that I know will satisfy their requirements, even if I dont give it any weight. Often it is incompetent people with little training telling an apparaiser how to appraise. I encountered reviewers that when asked said they ware new to the business. Some AMC's pay in time, some dont, taking 2-3 months to pay, after many reminders. But they all require a sometimes impossibly fast turn time, as if we only work for one AMC. Before we had pressure about value, now we have pressure about writing a report that will satisfy their guidelines. Bracketing bathrooms ? Very similar pressure. Appraiser independence does not exist as long as lenders can have various guidelines and insist that we follow them. There should be one set of uniform rules on how to appraise, that all AMC's and lenders have to follow.