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Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 23, 2010

Proposal: Regulation Z - Truth In Lending Act

Document ID: R-1394

Document Version: 1

Release Date: 10/18/2010

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Comments:

As I read through the regulations, I have several comments that I would like to give you. HVCC and the new regulations proposed border on a conspiracy to encourage a monopoly where AMC's have all the advantages. This is very unfair to the small appraisal shops and will in essence drive a lot of small appraisal shops out of business. Most AMC's are represented by TAVMA which would have you believe that their clients are at a disadvantage and operate at very small profit margins. If this was the case then you would not have seen the explosive numbers of AMC's over the past several years and many collect fee's that equal are to or are greater than double what the appraiser receives. Most companies have formula's to determine who gets the greatest preference when assigning appraisals. This formula takes several factors into account, such as turn time, meeting due dates, quality and # of times an appraiser accepts their standard fee without asking for an increased fee. Not all appraisals are the same and sometimes it is necessary ask for an increased fee, however this could effect you ability to get more work. AMC's while they do help assist the lender by managing national appraiser list, managing orders and reviewing orders, these fees are being charged to the customer. Prior to HVCC these functions were handled by the lender at the lender's expense, while the bank has not lowered their charges to consumers, this additional fee is no longer being paid by the lender and is being passed on to the consumer. Your proposed regulations are essentially raising cost to consumers, this is not protecting consumers, but they are increasing bank and AMC profits. If the whole intentions of the proposed regulations were to protect the consumer, it is very misguided when it comes to this issue. IN my opinion the proposed regulations need to be changed to set a standard for fee studies, but the issue should also make lenders responsible for paying the AMC charges and AMC's should not be able to exclude appraisers by the number of times the appraiser request a fee increase for complex orders.