

From: R. Manning
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Comments:

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It saddens me that as a business owner, I have little or no control over the fees I charge for my appraisal services. Twelve years ago, I began my appraisal career and in our office at that time (1998) our fee for a conventional 1004 appraisal was \$300. Since then, many new requirements have been placed on the appraiser, new mandated forms have been added, the list goes on... I can tell you that in today's environment any fee less than that is unsatisfactory. Some Appraisal Management Companies (AMCs) want an appraiser to perform this same service today, for \$200 or less in many cases. As a seasoned appraiser, I am being forced to accept fees that are less than they were 12 years ago. When an AMC calls me today, they are concerned about two things. What is the lowest fee I will accept? Can we get it back 24 hours after inspection? Twelve years of experience and all my formal education mean nothing. It is always the bottom line for the AMC. Some AMCs are making more than the appraiser is making and the appraiser did 100% of the work. This is unsatisfactory. This situation needs to be corrected. A wrong needs to be made right. Try telling your auto mechanic to fix your car and oh, by the way I only want to pay \$XX dollars. Or, try telling your heating and air technician to fix your A/C and oh, by the way I am only willing to pay \$XX. Fix it for that amount or I'll get someone else. In the real world, a person pays what is "customary" and "reasonable" for the services they receive. As an appraiser, that is all that we ask - "fair" and "reasonable" compensation. I don't believe for one minute that an appraiser is going to charge anymore than what he or she feels is "fair" and "reasonable" for their time and services. So why are seasoned veterans being forced to work for less than trainee pay while our government allows AMCs to make a killing off our profession at the expense of the appraiser, the appraiser's family, the lender, and the home-owner. Sadly, some poor individual in my market area is completing those appraisal assignments for \$200. Do these AMCs believe they can get a quality appraisal product for \$200. Dear AMC and affiliated lender, You received a \$200 appraisal and you will continue to receive a \$200 appraisal.

Ever heard the phrase "you get what you paid for". I ask the leadership of our nation to please adopt a "customary and reasonable" fee schedule. The Veterans Administration, appraisal software vendor Alamode and many others have spent countless hours of survey work that can be a valuable resource for establishing reasonable fees nation-wide. I ask that you give serious consideration to this matter, that you establish a "customary" and "reasonable" fee schedule as a "minimum" only requirement. The reason I ask that a fee schedule be established as a "minimum" only requirement is simple. Every appraisal assignment is different. It takes more time to complete an appraisal on a million dollar home than it would on a \$100,000 home. Some assignments are simply more difficult to complete and require more time to complete. As with most professions, the longer it takes to complete a job the higher the charge or fee is likely to be. In other words, the fee should be relative to the difficulty of the assignment. I ask that you set a "maximum" fee allowable that AMCs may charge and that the requirement for full disclosure of those fees be mandated. I also ask that their fees be "relative" to the services that they provide. Charging a home-owner \$500 for an appraisal, while the appraiser who does 100% of the work only gets \$200 is a sin. Its called "stealing". All that we ask is that we be paid "fair" and "reasonable" compensation for our services. As a retired Navy veteran, had it not been for my military retirement income I would have already been forced out of this profession long ago. Many of my peers do not have an additional income to supplement their loss of appraisal income. I want to give my son this opportunity some day and quite possibly my future son-in-law. Without "fair" and "reasonable" compensation I am afraid that there may not be any opportunity left.

Respectfully, R. Manning