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Comments:

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Comments:

As an appraiser, I very much dislike the way AMC's are able to operate and the environment in which they do their business. Are they not acting as third party agents similar to that found in the entertainment industry? They essentially are working as agents (a third party)for employment- However, I do not see that they are even held to the same standard as others that do the same thing as they do appear to share or assume the legal responsibilities of an agent. As it is today, there are many appraisers who can not without fear of some sort of economic retribution in today's environment negotiate or even have much of a say as to what THEY THINK is fair and reasonable compensation for any given situation or scenario. The current system in my opinion equates to a form of unfair and unethical labor practices. I AM AN INDEPENDANT SMALL BUSINESS PERSON UNTIL IT COMES TO WHAT I AM TO BE PAYED FOR MY SERVICES AND WHEN AND WHERE AND

TO SOME DEGREE HOW I PREPARE MY REPORT. I have one client who requires where I place their case number on my product. Even though its probably not a large issue- T resent it out of principle. The problem this creates for me is that where they want me to place their case number is where my software is designed to place MY CASE NUMBER. This really messes up my internal tracking system. Here is another problem that I have encountered. If I personally decide to refuse a case due to caseload concerns and turnaround time, I sometimes get badgered (if not interogated) as to why I can not do it. There is no doubt in my mind that if things get much worse with this and other things, I will have no choice but to make a choice as to whether I stick with it until I retire or leave the profession altogether, or do it part time. I really think that support is growing with appraisers that want to organize into a guild or a labor union and I am all for it at this point. I think that a prolonged work stoppage would send a clear and concise message that we are not cattle- we are human beings who have INDEPENDENT BUSINESSES. Pressure for turnaround is another issue- it stresses me out to the point that I have worked just about every weekend within the past several years and many weekends going

back years. I have started to change that as my health is being adversely impacted. If those AMCs and lenders feel the need to have this control that they put on our backs- THEN they should hire me as an employee, give me benefits, a company car, all of my office supplies and equipment, access to information and MLS data, a title or position with the company, and work hours and responsibilities. The working environment of my career is clearly not as fulfilling as this industry provided when my father trained me back in the 1980's. On the positive side of all of this, the new regulations have given me more appraiser independence than I feel I have ever had. I do not have to deal with the statements and perceived attempts from mortgage officers concerned with making "the deal." Back 10 years ago, I'd say that about 40% of the people I did business with would openly deal that out on me. However, as I have always done things honestly (my Father would have had it no other way) I learned very early how to deal with this and never had a problem telling people to head on down the road if they did not want my honest opinion (or if they wanted me to bury some material fact regarding the property) It did cost me some business but I have always had enough work from my clients who respected me and my opinions. I return- I have had much respect for those clients who have acted professionally. (I do miss those business relationships with my good clients which I am no longer permitted to have. Thank you for this opportunity given me to explain my feelings. Overall, from an appraiser's standpoint- there have no doubt been improvements. However- there are many aspects of this new way of doing business where things have gotten worse. Respectfully
Submitted, Dwayne Whitmore, Mid Maryland Appraisal Service