From: Matthew J. Burlando

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Comments:

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Proposal: Regulation Z - Truth In Lending Act

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We are now a profession with college education requirements and we are at the mercy of unregulated management companies were fee and turnaround time is king and brain cells optional. The actually grade us by how many days it takes to turn in a report and if they want something as minor as a north arrow on an addendum of the report they decrease your grade level. This profession has not had fees that recognize the level of requirements that are mandated by Fannie Mae and individual management companies (as they all add little tidies things that will have your report rejected if it does not have exactly what each single one wants). I work for over 20 companies and I can't keep track of how each one requires each report it is ridiculous. Most of the times the management companies pre-underwrite the reports and think they know more than the appraiser about the area that I was born and raised in then they reject the report before the bank even sees the report. I work in complex areas were nothing is similar. It requires a broad search and exceeds all of the guidelines set forth for urban areas. Then they can't figure out why we can give them two more sales within a 1 mile radius, with a transaction date of 90 days as of the effective date of the appraisal that are similar in living area, site size and amenities. Fees in my rural area would require \$600 to nearly operate just at cost. The costs of an office, MLS, data specific to the area, costs the county charges for information, software, continuing education, 4x4 vehicle, fee's to state and federal regulators are nearly \$2,000 to \$3,000 for most appraiser's. So the only way for an appraiser to make a living in this business is to rape out crappy appraisals at high volumes and hopes to not get sued and striped of their certification that they worked over 3 to 5 years just to receive. NOT ME I JUST LOOSING MONEY EVERY MONTH AND GIVE A HIGH QUALITY OF APPRAISAL WITH A HYBRID OF FORM AND NARRATIVE INFORMATION BECAUSE THE FORMS ARE BUILT FOR URBAN AREAS WITH LIKE PROPERTIES. SO I WILL KEEP LOOSING MONEY UNTILL THE FEDERAL GOVERNMENT PULLS THEIR HEAD OUT OF

SAND AND MANDATES A FEE THAT IS COMPLIMENTARY TO THE EDUCATION, LIABILITY AND

COMPLEXITY THAT WE ENDURE. FANNIE MAE HAS MORE PICTURES, MARKET TRENDING, NEW