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Comments:

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Comments:

This my second attempt at posting a comment. I am alarmed that my first comment never was posted although I said nothing extraordinary other than pointing out specific instances of pressure even without orders from Mortgage Brokers. The pressure is subtle and, unfortunately, a direct result of the current situation with "customary and normal" fees in contention. From a long standing client, orders are pulled if I ask for higher fees for very complex assignments (a 5000 sf home on 2.9 acres in an area where 3000 sf homes are normal on less than 1 acre). The appraiser MUST be the one to decide first the complexity of the assignment and then the scope of the work necessary to complete the assignment competently. The fee offered was \$375 yet an assignment like this will take 4 to 5 days. Even the processors ordering the report are making more than that. Upon stating that the fee would be \$750 (which is still very low for 4 days work) the order was removed from my work load. This kind of response is the norm now as even these direct lenders try to force fees down in order to have "customary and normal" be set as low as possible - just six months ago this same lender paid \$850 for a 4000 sf home in the same general area on a 1.5 acre lot so any claim that the fee offered IS (or WAS) customary or normal is bogus. I can cite numerous instances like this. Your attempt to set "reasonable and normal" standards has, if anything, led to a reduction in fees in the short run and possibly into the future. The fact that an appraiser with 33 yrs in the business, a USPAP Certified Instructor, a member of our County's Assessment Appeal's Board, the Senior Real Estate Instructor at our local Junior College, is being offered fees that are less than she (I received) in 1986 is outrageous... and when I stand up and say no, the fee needs to be _____ for these reasons which include the required scope of the work & competency, I merely get moved to the back of the list and the assignment is taken away from me. In the "old days" (into the 1990's) lenders held loans in their portfolios for 1 to 2 yrs to 'season' them. That practice is long gone yet were it reinstated Lenders would have a much greater interest in using competent appraisers rather than the fastest and cheapest appraisers for their underwriting processes. The quality of their portfolio would once

again matter to them. With all my years in appraising, it is scary to think that the routine appraisal fee is less than it was in 1986, the liability is greater, the costs of being in business are greater, and virtually all appraisers who were appraising in 1986 are making significantly less now, both gross and net, than they did back then. Forget customary and reasonable fees and, instead, require that Lenders hold their loans for 2 to 3 yrs - I guarantee the loan product and resulting mortgage backed securities will be much less a problem than they have been in recent years. Oh, and appraisers will be paid more fairly because lenders will once again look to that old adage under which I was trained, that appraisers are the "eyes and ears of the Lender".