

From: Matthew J. Burlando
Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 24, 2010

Proposal: Regulation Z - Truth In Lending Act
Document ID: R-1394
Document Version: 1
Release Date: 10/18/2010
Name: Matthew J Burlando
Affiliation: MLB Appraisal and Associates
Category of Affiliation:
Address:
City:
State:
Country:
Zip:
PostalCode:

Comments:

We are now a profession with college education and extensive experience requirements yet we are at the mercy of unregulated management companies where the lowest fee and quickest turnaround time are king and brain cells are optional. These management companies 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 a map addendum in the report they decrease your grade level. This profession has yet to receive fees that recognize the level of requirements that are mandated by Fannie Mae and individual management companies (as they all add little tedious dictates that will cause your report to be summarily rejected if it does not comply with each and every edict). I work for over 20 different management companies with different requirements and it is virtually impossible to keep track of how what each company requires for every report and it is ridiculous. Most of the time the management companies pre-underwrite the reports and are of the opinion that they know more than the appraiser about the area and market that I was born and raised in that they reject the report before the bank/lender receives it. I work in complex areas with very little consistency of property types requiring a broad search for data that typically exceeds all of the guidelines set forth for urban areas. Then they can't figure out why we are unable to give them two more sales within a 1 mile radius, with a transaction date of less than 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 need to be at least \$600 to break even. The expense of maintaining an office, MLS and other data specific to the area, costs the county charges for information, software, continuing education, 4x4 vehicle, fee's to state and federal regulators are easily \$2,000 to \$3,000 per month for most appraiser's. At current fees (generally under \$500 per report) the only way for an appraiser to make a living in this business is to crank out minimal appraisals at high volumes and hope but not to get sued and even stripped of their certification that they worked over 3 to 5 years to receive. NOT ME, I JUST KEEP LOSING MONEY EVERY MONTH BY PRODUCING HIGH QUALITY

APPRAISALS WITH AN UPGRADED HYBRID OF THE REQUIRED FORM AND NARRATIVE SUPPLEMENTAL INFORMATION IN VARIOUS ADDENDUMS BECAUSE THE FORMS ARE MORE SUITABLE FOR URBAN AREAS WITH CONFORMING PROPERTIES. SO I GUESS I WILL KEEP LOSING MONEY UNTIL THE FEDERAL GOVERNMENT PULLS THEIR HEAD OUT OF THE SAND AND

MANDATES A MINIMUM APPRAISAL FEE THAT IS COMPLIMENTARY TO THE EDUCATION, LIABILITY AND COMPLEXITY THAT WE ENDURE. FANNIE MAE HAS CONTINUALLY REQUIRED MORE PICTURES, MARKET TRENDING, NEW FORMS, ETC. AND IT IS PAST TIME FOR A FEE INCREASE AND A MANDATED MINIMUM BASE APPRAISAL FEE!!!!!!!!!!!! GET IT DONE!!!!!!!! OR YOU WILL LOSE ANOTHER GOOD APPRAISER THAT ACTUALLY DOES THE JOB RIGHT AND TO ALL

THE RAPE ARTISTS OF THE BUSINESS GET OUT OF THE APPRAISAL BUSINESS AND BECOME SOME OTHER FORM OF LOW LIFE BECAUSE YOU ARE A DISGRACE TO THIS PROFESSION AND

YOU SHOULD NOT BE ALLOWED TO BE CLASSIFIED AS A PROFESSIONAL. It is time for the federal government to have an appraisal approval process similar to the VA and not leave it to the hands of the banks or middle management companies that are in the business of making money and getting an appraisal for the file to make the loan regardless of the quality of the report. I could say a lot more about the status of this appraisal business that I try to treat as a profession, and I may later if I have time, but right now I have to get back to updating some management company that faxes and calls me every day on an appraisal I told them will take longer because it is complex.