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Comments:

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Customary and Reasonable Fees should be based on the standard fee schedules that appraisers charged their broker, lender, and non-lender clients directly prior to HVCC and not based on common fees now being paid by AMC's. The VA Fee schedule is a good guide also as this has actually gone up since HVCC based on the more complex and detailed lender reporting requirements. Full and clear disclosure needs to be given to the consumer regarding what fee the appraiser actually receives and any additional fees charged by AMC's and or the lender for appraisal processing or assignment/management. No amount of regulation is going to solve the problem of pressure on appraisals. Appraiser's are still being denied work by AMC's based on their client(lender) requests to not send their orders to a particular appraiser. The only way to really decrease the amount of pressure is through a system like that of the VA. In such a system a third party, not dependent in any way on the loan/appraisal process, not only assigns the orders, but also controls the reviews of the appraiser's quality of work, as well as the appraisal roster and rotation schedule. AMC's are compensated by their clients, the lenders, and thus must listen to them in regards to their rotation of appraisers, their reviews of the roster appraiser's work, and which appraiser's they will accept appraisal's from. If they do not listen to their clients, they will have no clients and thus go out of business. In this way the lenders still can pressure the appraiser, it now just comes first as pressure on the AMC that is then passed on to the appraiser.