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Comments:

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The appraisal industry has become a victim to unscrupulous AMC's. The AMC's are contributing to poorer quality appraisals by the extremely tight turn-around-times required. Most of the time, the fees offered for appraisal services are much lower than this industry has seen for decades. I generally do not like over regulation by the government, but I believe a customary and reasonable fee system must be established in this situation, along with reasonable time frames to properly complete an assignment, or the majority of the existing appraisers will be forced to leave the industry. Many appraisers have already done so. I do not know of any appraiser who can afford the time or wages to train a new appraiser under the present conditions forced upon us. The present VA fee structure and turn time is quite reasonable. I would also advocate that the VA selection system for appraisal assignments is a good model to follow in that it is one of the best methods to reduce the opportunity for appraisal fraud and appraiser coercion. I recommend that at least the FHA should return to a similar system again. The way it is now, AMC's will simply cease to offer appraisal assignments to any appraiser who turns in an appraisal with a value lower than desired, or is unable to meet their 24-48 hour deadline. The AMC will reply that no assignments are available in the area if the appraiser queries them about the loss of work. The consumer and the appraisal industry has been dealt a great blow by the onset and proliferation of the AMC's as a result of the very flawed HVCC which was enacted. The consumer is paying more, receiving less in many cases, and the appraiser is being strangled. Many of the key players in the mortgage fraud that has transpired in this last decade are now operating an AMC. The appraisal is a vital part of the loan process, yet the appraiser gets the least compensation or consideration in the whole process.