

From: B. Cooper
Subject: Regulation Z -- Truth in Lending

Comments:

Date: Dec 27, 2010

Proposal: Regulation Z - Truth In Lending Act
Document ID: R-1394
Document Version: 1
Release Date: 10/18/2010
Name: B Cooper
Affiliation:
Category of Affiliation:
Address:
City:
State:
Country:
Zip:
PostalCode:

Comments:

AMC's have been able to destroy the majority of the appraisal business and push to discredit professionalism of appraisers, in the short amount of time they have been in business, is appalling. It is not unusual for the AMC to charge a lender \$450 and up for an appraisal, with under \$200 going to the appraiser. The lowest fee seems to drive who gets appraisal assignments these days. Therefore, many experienced qualified appraiser are turning down the work of the most cut throat AMC's. The use of AMCs may be necessary, however should all be regulated to prevent capitalization of a private AMC market and fees less than the AMC receives for choosing an appraiser. these methods are not only a disservice to the borrower and lender, it is dangerously close to the attitude and problems that got us here in the first place. Without setting a nationally accepted starting point for reasonable and customary fees, AMC's will continue to pay out the lowest cost appraiser and charging the borrower for their "hard work". TAVMA may have a louder voice, with well funded lobbying effort, to keep you from adopting the VA fee schedule as a minimum fee. The appraisal industry is composed of many independent appraisers and one person shops. The Appraisers voice should be hear just as equally with the large support of OUR Nationally recognized appraisal organizations and affiliations. By adopting the VA fee schedule as the basis for customary and reasonable fees, you will take price out of the equation for the AMC's in determining how appraisals are assigned. This is good for lending and good for the housing markets. I implore you to adopt the VA Fee schedule as the basis for Customary and Reasonable fees and not leave that determination to a for profit industry seeking to increase their own bottom line.