

From: Ed Lorenz
Subject: Regulation Z -- Truth in Lending

Comments:

From: Ed Lorenz
To:
Date: 04/18/2011 12:15 PM
Subject: Fw: AMC's and Presumption 1

TO WHOM IT MAY CONCERN,

THESE FEES ARE REASONABLE & CUSTOMARY FOR THE MARKET AREA AND NOT FEES THAT ARE FORCED ON THE APPRAISER BY THE AMCs. HOW IS IT FAIR THAT AMCs GET FROM 20% TO 60% WHEN BASICALLY ALL THEY DO IS SELECT AND KEEP RECORDS OF THE APPRAISERS THEY SELECT. A LOT OF TIMES THEY DO NOT HAVE RANDOM SELECTIONS BUT KEEP LOOKING FOR THE CHEAPEST APPRAISER. THIS USUALLY ENDS UP WITH AN APPRAISER THAT IS LESS EXPERIENCED AND DESPERATE FOR WORK.

WITH THE CURRENT SYSTEM THE CONSUMER IS PAYING MORE AND BLAMING THE APPRAISER FOR HIGH FEES. THE CURRENT SYSTEM ALWAYS TAKES LONGER IF THERE ARE QUESTIONS. THESE QUESTIONS CANNOT BE ANSWERED BY THE DIRECT PARTIES; THEY ALL HAVE TO GO THROUGH THE THIRD PARTY (AMCs). SOMETIMES IT CAN TAKE FOREVER AND THE APPRAISER WILL GET THE BLAME.

REASONABLE AND CUSTOMARY FEES ARE A LITTLE DIFFERENT FOR EACH AREA BUT ARE THE FEES THAT THE APPRAISERS HAVE BEEN CHARGING FOR THE PAST FEW YEARS. THEY WILL BE GOING UP AFTER 9/1/11 OF THIS YEAR DUE TO A NEW FORM/INPUT & STANDARDIZED ABBREVIATIONS.

I BELEIVE THE AMCs SHOULD BE LIMITED TO A SMALL PERCENTAGE OF THE APPRAISAL FEE (1%-5%) OR HAVE THE LENDERS PAY THE FEES. IF WE DO THIS, THE CONSUMER WILL NOT GET GOUGED WITH HIGHER AND HIGHER FEES. ALSO, THE APPRAISER WILL NOT GET BLAMED FOR THIS FIASCO.

SINCERELY,

ED LORENZ

PS: I THINK YOU ARE LOOKING AT THIS ALL WRONG, YOU SHOULD BE ASKING WHAT IS A REASONABLE FEE FOR THE AMCs. THERE SHOULD BE A LIMIT ON THEM AS LENDERS. IF LENDERS HAVE A 3%, THEN THAT SOUNDS GOOD FOR THE AMCs.