

From: AIA, Tapani A. Talo  
Proposal: 1443 (RIN 7100 AD 90) Higher Risk Mortgages  
Subject: Reg. Z - Interagency appraisal requirements for higher-risk mortgages

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Comments:

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Proposal: Appraisals for Higher-Risk Mortgage Loans [R-1443]  
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First name: Tapani  
Middle initial: A  
Last name: Talo  
Affiliation (if any): AIA

Your comment: NY Super Studio Architects est. 1984 Tapani A. Talo, AIA, Principal Architect, Photographer and Artist Ms. Monica Jackson, Office of the Executive Secretary Bureau of Consumer Financial Protection 1700 G Street NW., Washington DC 20552.

Re: General Guidance for the future of Bureau of Consumer Financial Protection Ref: Docket No. R-1443 or RIN 7100-AD90, Appraisals for Higher-Risk Mortgage Loans [R-1443] Ms. Monica Jackson, This following text is from 62 year old architect who has seen the best architecture in USA and around the world over the years. As long as USA as a nation does not see that there is a link between smart lending with appropriate appraisers, and people who design buildings, architects. How to form a mental realization of direction that our nation as a whole want to go in order to be free from foreign energy, finances and reduce the need to have extensive military budget which supports our old antiquated policies and laziness how we use enrgy.

The general attitude of smart Green for most is like looking at ingredients in our cereal boxes for breakfasts, never done. Any corporation that does not follow smart growth go bust, but nations are no different in current economic globalization. Nations are meant to safeguard the next generation, but we focus on convenience of today, forgetting that all our efforts are no value unless our children can live in peace, work and reasonable shelter. Just like in the last 4 years funding for banks was done by Federal Reserve based on sound return on capital. Why we cannot use the same tools to plug a hole that is bigger than the entire military budget each year. ½ to ¾ of trillion a year roughly wasted EVERY YEAR with current oil and resource prices.. [Naturally if we had also a long term smart public view about transportation, including schools, we could duplicate this number.] Why is it that we cannot extend this thought pattern to the SIMPLEST of things like efficiency in our building stock where known approaches have been taught for the past 40 + years, but cannot be implemented due to wrong tax return and incentive policies. And the only profession that can fix this it is on the ropes like NEVER BEFORE and close counting to 10 in the ring of survival - ARCHITECTS. Building efficiency does not require rocket science like electronics or medical industry, but sun shading, proper thicker walls (this is critical no no in current rental lease calculations, as it means that we cannot do energy efficient and long lasting exterior walls) and correct windows, less deep plans core to window wall to reduce both mechanical ventilation and electrical lighting, simple geothermal heating and cooling with radiant method rather than expensive fan powered

method, and solar - both PV panels and wind generated at each school, public building and hospital location at least. Yes, this means changes in building equipment design and usage, but like Detroit has shown with cars in JUST 4 YEARS, we can do it! As Mr. Durst said building the last two skyscrapers in New York, if he had not personally sat on each critical meeting, none of the engineers would have done anything different from the past. Only the architect, who wanted to do the same as Mr. Durst, supported the new process first. Change is not easy... Our current energy in the Senate bill in works is so flawed that we will lose a generation of progress if it cannot be checked to reflect HOW BUILDINGS should be built by architects in charge, and once built, appraised by appraisers that understand energy mandate, and LOWER the evaluation if structure is not up to future standards. In France this is happening already, one cannot rent until space or building upgraded. And this is why this comment is included under 'Appraisals for Higher-Risk Mortgage Loans', to find a way where federal reserve is not pouring incentives to outdated procedures and to help to achieve a better future for our next generation at least.

Regards Tapani Talo