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To whom it may concern: I'll start off by saying that I'm not the sharpest tack in the box or the brightest star in the sky, however, I do try to pride myself on having common sense. This is the biggest issue lacking in most of these proposals. It seems in order to make things simple they first have to be complicated-why? There's always a solution to a problem, that's the problem. It's the politicians, lobbyist, etc., that make policies that seem to hurt more than they help-why?(he who has the gold-rules). I'm still wondering why AMC's were set up in the first place? This was set up to help this industry? I believe it only hurts this industry and has added another piece to the puzzle that goes back to what I said before, why do things have to be so complicated to realize there are simple solutions to problems. I understand it was set up under the HVCC, blah, blah, blah. Need I say more? This leads to what I think is a simple solution to what is now becoming criminal. Somebody needs to stop this now, because there will be consequences I believe once the AMC's become regulated. That's if you will be able to find them. Here's the problem and then I'll introduce my solution. The problem is now there's a third party involved in the appraisal process. Not an in-house third party, another entity, company, person, whatever. This is how I see it works. The appraisal is ordered through an AMC. Then the AMC assigns it to an appraiser, an appraiser who has to or already has filled out paperwork to be put onto their list(s). The appraiser is now told there is conditions to performing this assignment. Each company has it's own set of rules, once again-why? Anyway, the appraiser completes the assignment and now has to send it back to the AMC through their system which sometimes is confusing and time consuming("time is money"). Then the AMC has to send it back to the lender. Let's say the appraisal is completed in compliance with everything. Did I forget to tell you the AMC has already collected the fee for the appraisal. So the only person that has gotten paid is the AMC. This being said, the appraiser now has to wait 30, 60

and or 90 days to receive payment-why? The AMC already has been paid for the appraisal, why do they need to hold MY money? Now, if the appraisal comes back with stips, then this process happens all over again. Underwriter sends it back to the LO or Broker, whoever, then they send it back to the AMC, then the AMC sends it back to the appraiser for revisions, then once that is complicated it is sent back to the AMC and then back to whoever sent it to the AMC and back to underwriting. I'm not missing anything, because this process can actually be repeated again and again, for the same appraisal, because they don't understand when the appraiser says there is nothing else to provide they don't seem to understand(that's a whole other issue I can go on about). It seems like there are one too many procedures involved. Lets say we as appraiser have to accept this and the AMC's. Here's what I believe to be a simple solution besides getting rid of the AMC's altogether and having each company set up an in-house department or person to handle all of this. There goes an overpriced management fee not needed and time which saves everyone even more money. I'll discuss this in my solution below. What I don't understand is why doesn't anyone recognize that the mangement companies are charging the customer reasonable or customary fees? These companies are charging \$350, \$400, and even higher fees for the appraisal or what's reasonable in that market. They just aren't paying the appraiser that fee and that's why your not allowed to submit an invoice with your appraisal because they are stealing appraisal fees and committing criminal acts. Why doesn't anyone see this? Because on the Hud it shows the AMC's fee's which are not what they pay the appraiser. Some companies will accept your invoice but it has to be uploaded through another process-why? Because I just told you why, they are stealing monies. Here's my solution to this if the need for AMC's are still needed. Why don't the AMC's do what they are suppose to do and that is manage this process and elimtate collecting fees from the customer. By doing this what will happen is the appraiser will get back some of their independence. The order can be order through an AMC and then sent to the appraiser who then contacts the customer anyway to set up an appointment, and the appraisers collects his or her fees. This will save everyone time and money. The management companies will no longer have to collect a fee which would elimtate a credit card machine and the fees associated with that, get rid of their accounts payable department because they no longer have to pay appraisers or be responsible for payement if anything goes wrong, save hundreds and thousands of trees but saving on envelopes, the paper the checks are printed on, offices supplies and the potal associate with mailing out these checks. This is a win, win for everyone. That also means these companies will no longer be committing criminal acts which will save time and money for our court system(s). Once these companies are regulated what I think may happen is you'll see a lot of the AMC's pack up shop and dissappear leaving both sides wondering where is the appraisal and where is the company who has all these appraisal waiting to be order and or completed. Just a thought. I just want to thank all who have been involved in trying to help our industry. Respectfully submitted, Barry Kimmel