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Subject: Regulation Z -- Truth in Lending

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Comments:

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This correspondence is in reference to the Dodd-Frank financial reform bill. This bill addresses, at least in part, "reasonable and customary" fees paid to appraisers by appraisal management companies to insure that appraisers have the necessary resources to perform a complete and thorough analysis. I have over thirty-five years of experience as an active fee appraiser and with the exception of the Veterans Administration, over the past ten years, appraisal fees have been going down while expectations and expenses have been rising. With the passage of the Home Valuation Code of Conduct legislation came an increase in the number AMC's that appear to be dedicated to raising the cost of the appraisal to the borrower, but lowering considerably the amount actually paid to the appraiser. It seems the focus has turned away from a reliable appraisal to the least expensive appraisal fee that can be turned around in the shortest amount of time. The S• debacle and the most recent problems with mortgage fraud were fueled by pressure from clients to hit values. This often resulted in careless and inaccurate analyses with disastrous results. While the current focus may not be on value, this same pressure to hit turn times and accept a fee that does not allow proper research and analysis will be counter productive to what this bill is trying to accomplish. As you finalize this legislation, please consider that it is in the best interest of both the client and the borrower to have an accurate analysis of the property involved. There is more to the process than shuffling paper in an unreasonable time frame for an unreasonable fee. Thank you, Robert K. Bates