

From: Gus Diaz
Subject: Regulation Z -- Truth in Lending

Comments:

I am certified in two states as a real estate appraiser. The current conditions for real estate appraisers is dire and you must implement customary and reasonable fees for all states and limit the control of the AMC's.

In all fairness, there is the exact, if not more pressure from AMC's as there was prior to HVCC and the AMC requirement. This pressure may be different but in most cases is far worse than the pressure before the mandatory use of a third party AMC. Prior to having AMC's, we could choose not to work for any of the thousands of companies that applied pressure. Now each appraiser is limited to a few hundred AMC's that are not required to guide themselves by the rules that govern appraisers (USPAP). So they push us at every corner to work harder for less money. Sometimes I must accept work where I lose money just so I will not be refused future work. This is not allowed but there is no complaint system in place to report abuse.

Fair fees that have been established for years by the VA office or prior fees recorded on every HUD statement prior to 2009 would clearly indicate that typical fees were at a bare minimum of \$ 275-\$ 500 based on complexity for the standard URAR, the FHA and VA average was \$ 425-\$450. Multiple family properties, ranged from \$ 400-\$800. Of course, these are my local areas. Without these fees, there is no chance of hiring trainees, office personal and necessary services required by AMC's such as local MLS and TRW which are online data sources, Errors & Omissions Insurance, Continuing Education and licensing fees.

The fees indicated by AMC's as necessary are truly unreasonable and only pad their profit margins.

You should emphasize that appraisers be paid what they have been paid in the past, allow AMC's to collect from their client, the lenders or banks, whatever fee they deem reasonable. This way the appraiser is paid what they have always been paid for the past two decades, the lender obtains fair market fee by billing the lender or bank for the services they provide and the consumer pays the cost of the appraisal only and is protected from being gouged by the AMC's. This way, every company, (lender, AMC and appraiser) gets their fair market fee and the consumer/homeowner is protected from inflated fees unfairly increased by the AMC's that are truly servicing the lender/bank, not the appraiser or consumer.

Since this all started by lenders/banks putting pressure on appraisers, the fee for this service should be put on the lender/banks. At this point, the appraiser is the victim of lower fees because of the pressure put on them by the lenders or banks, who now enjoy greater profits for their (illegal) prior pressure on appraisers. This is a very unfair practice which you now have the power to now correct.