

From: Farmers State Bank, James L. Bohls
Proposal: 1443 (RIN 7100 AD 90) Higher Risk Mortgages
Subject: Reg. Z - Interagency appraisal requirements for higher-risk mortgages

Comments:

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Proposal: Appraisals for Higher-Risk Mortgage Loans [R-1443]

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Your comment: The requirement as proposed, for the use of Certified or Registered appraisers on all Higher-Risk Mortgage Loans no matter what the amount, will simply increase the cost of obtaining a mortgage loan principally for low-moderate income borrowers who normally do not qualify for higher dollar homes and therefore higher dollar loans. Once again, the cost of increasing regulation will be passed along to the consumer, and in this case it will penalize those that can least afford it. We presently try to cut consumer cost for smaller HRMLs by having a loan officer sign off on opinions of value based on information provided by a licensed appraiser, and not a full appraisal prepared by a licensed appraiser.