
From: Dave Caddell [mailto:dave@caddellappraisals.com]
Sent: Saturday, November 15, 2008 3:31 PM
To: _Regulatory Comments
Subject: apraiser comments

I have been appraising for 17 years and built a good honest business and do not deal with pressure as my clients know better. What happened to just enforcing the rules in place now? Example if a lender, re broker or appraiser commits proven fraud, then they should be barred from practicing in all 50 states forever and go to jail. Demand geographic competency and enforce it as this one of the major problems, appraiser's feeling pressure to take every job even in areas they do not normally go, access to MLS data does not make one competent, teacher say you can know an area by driving around some etc. that is not true. HVCC is wrong as it just creates another industry of AMC's that will still pressure because they are not bound by anything. By forcing appraiser's to work for less, the best will leave the industry. As it is appraisal fees have gone up only \$100 in my area in 17 years, that is nuts as more work is required, higher overhead etc. By just rotating appraisers like FHA used to is also wrong as then some appraisers forget their people skills. Do quality control reviews with named blacked out like in the old days, now with everything digital names are not blacked out.

Appraiser's are not always to blame, what happened to re agents as they pressure lenders who pressure appraisers etc. they get the most money out of a deal and throw that power around by being able to "send business" to certain lenders, they should have nothing to do with lending, but we have re offices that also have lenders in house in some cases, wrong wrong, wrong, we may as well let the fox count the chickens at night.

Get some working appraiser input instead of career beaurocrats who do not know the industry.

Sincerely

David P. Caddell
Caddell Appraisals Inc.
B 970-577-9545 Fax 970-577-7596 Cell 970-231-5815
Dave@caddellappraisals.com
www.Caddellappraisals.com