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Comments:

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I want to post my comment to urge you to enact Customary and Reasonable Fees for Appraisers nationwide. Appraisers have over the past 20 years received typical fees directly from \$300 to \$400 or more for greater complex assignments. It has never gone up and now it has dramatically decreased because of AMCs. It is not a secret. Since 2009 we have been subjected to AMCs who are taking 50% or more of our fees with some banks/lender requesting appraisals with fees that are already less than adequate before the split. For example, recently I recently appraised a home in a luxury enclave of Alameda county. Homes here are well over \$1M upwards to \$5Millions and complex in nature. One company paid the appropriate fee of \$1000 which the AMC took half while the appraiser did all the work. Within that same week, I received another appraisal for a similar type of assignment for a similar complex in the same area and the lender was paying \$233.00 This kind of rampant bullying with our fees has got to stop. Undermining our fees, undermines the profession and results in promoting shoddy appraisals and less credibility of the profession as a whole. When home owners pay for appraisals, they believe the fee goes to the appraiser, not the bank, lender, or AMC - they have a right to know because they will not feel comfortable when Joe X comes to do an appraisal for \$130 on their most important investment. They want an assessment that is accurate, and accurate requires the appraiser is hopefully getting paid more than Starbucks coffee barista at the corner mall.