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Comments:

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Comments:

I am a real estate appraiser that has almost been put out of business due tot the HVCC. This regulation caused me to lose all of my clients, which I built over six years. I have been forced to work with AMCs that pay significantly less than C & R fees with ridiculous turn times. This regulation has also caused the opposite of what it was meant too, it is costing consumers more for an appraisal (double in my area) while the appraiser receives half of what they used too. This is resulting in inexperienced appraisers appraising homes incorrectly and lower than they should be (while we are in a major recession, I have seen appraiser take the three lowest sales, despite conditions. This is causing the home values to drop further (the same way using the highest three sales artificially inflate the values). At the very least lenders need there needs to be accountable to the lender and AMC for the appraiser. This way they have an incentive to hire the correct appraisers and pay C• fees. AMC fees should come out of the lenders pocket, not the appraiser, who make much less to begin with. Fees from the borrower should go strait to the appraiser, not through the lender, not through and AMC, I have seen lenders pad said fee so that they can pocket extra money. What I would truly like to see is they "firewall" removed, the corrupt be punished, not the innocent (which the HVCC has punished). The corrupt will always find a way to break the rules, which the honest follow the rules that hurt them. I have seen first hand the breach of said firewall.