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Comments:

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Regulation Z, #226.42f. Customary and reasonable compensation is not being offered by AMC's in my market area which is Northern Virginia. The typical fee's paid for conventional loan single family residential property appraisals in this area are \$400 to \$450 for dwellings assessed for less than \$500,000 with fee's exceeding \$400 to \$450 for dwellings assessed above \$500,000. The AMC's, specifically "Landsafe Appraisals" as an example, are paying the appraiser only 72% (or less) of those fee's considered typical for appraisals having the same scope of work. The AMC's are typically paying 50% to 72% of what the typical independent appraiser charges in this market area. The AMC's should be required to pay independent fee appraisers what is customary and reasonable for their market areas. The current fee schedules offered by AMC's to independent fee appraisers will lead to the AMC's utilizing the lesser qualified appraisers, due to the lower fees, which could result in questionable appraisal values.