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Comments:

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Regarding "Customary and reasonable rate of compensation for fee appraisers." Customary and reasonable must be treated as two separate and distinct concepts. Customary is just area average -- arduously but easily determined mathematically. The second concept is "Reasonable". That's what you'd see if you presented a complete, professionally done appraisal report in front of an Attorney, Accountant or some like professional and asked what they would charge for similar amount of time, effort and report composition. I anticipate the wide average of fees would be a lot higher than what the lenders have already worn down over the years then established their AMCs to take half of what's left. There are those who, on behalf of their profit structure, are attempting to wrap these concepts into one idea in order to reduce that concept to mean "average". And, as fees become institutionalized once again professionalism is compromised. Please, on behalf of a small profession that is trying their best to maintain stability and hold on to integrity, please don't fall for this subtle ruse.