

Marvin Dever, Inc.
"Appraisals Made Easy"
Brokerage - Consulting

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November 18, 2010

To: Kathleen Ryan
Senior Counsel
Division of Consumer and Regulatory Affairs
Federal Reserve Board
Washington, D.C. 20551

Dear Ms. Ryan:

It is imperative that the VA Fee Schedule in conjunction with the Dodd-Frank Financial Reform Bill be adopted as the customary and reasonable minimum fee that an appraiser shall be paid in the appraisal of a residential structure. This is the only independent fee schedule which is nationally recognized and can be relied on. Any other schedule can be manipulated to satisfy the whims and wishes of a particular interest group, particularly the Appraisal Management Companies. The Appraisal Management Companies are dictating and fixing prices at a rate that is in many instances 50% less than the VA Fee Schedule and what used to be the considered a customary and reasonable fee.

As one who appraises in more than one state, when I think I have seen it all something else happens which leads me to believe I have not. I can tell you with a degree of certainty that since the inception of the HVCC and the advent of Appraisal Management Companies the market has been in a very chaotic and unstable environment, has had increasing pressures from sources with little or no knowledge of the real estate industry and in particular no knowledge of appraising or what is involved in the appraisal process. What the HVCC and Appraisal Management Companies have done is create a hostile work environment, allow work to be done by the cheapest appraiser regardless of their knowledge, qualifications, or geographic competency. This will lead us back to the same housing mess we are currently trying to escape.

Again, to eliminate this situation and restore order in the market place it is imperative the VA Fee Schedule be adopted as the minimum customary and reasonable fee that an appraiser shall be paid.

Also there is the problem of consumer protection whereby the home purchaser is being charged significantly more for the appraisal. In many cases all over the country the appraiser may receive as much as 50% less than the VA Fee schedule while the consumer is charged significantly

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more. Many times this is more than double what the appraiser has received. Hardly an ethical situation. The adoption of the VA Fee Schedule will allow any consumer to go on line to see if they are in fact paying a customary and reasonable fee for an appraisal or if they are in fact being scammed by someone, usually the Appraisal Management Company. This is why many of these entities do not want appraisers to submit invoices and have no conversation with anyone other than them. The dirty little secret is they want no one to be made aware of their sometimes unethical and possibly illegal activities.

Since their inception some 5-8 years ago the Appraisal Management Companies have run over the appraisal industry and the appraisers. They have gotten away with just about anything you can imagine. They are the only component of the real estate industry which has been totally unregulated-no background checks, no ethical standards, no show of financial stability, no continuing education requirements, no insurance requirements. In reality they have been on a free ride at the expense of the appraiser and the consumer.

Having said all this I would like to thank you for this opportunity to comment.

Sincerely,



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Real Estate Appraiser
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