

From: Steven Hall
Subject: Regulation Z -- Truth in Lending

Comments:

Just a simple statement. An Appraisal Management Company, AMC, contacts appraisers and asks if the appraiser wants to be on their fee panel. The AMC ask the appraiser what the appraisers fee would be for a URAR. The AMC tells the appraiser they only pay \$X which is some percentage of the reasonable & customary fee charged by this appraiser. The AMC then asks the appraiser if they would like to become a member of their panel because the AMC offers a volume of work. The use of AMC fee schedules is absolutely contrary to the intent to promote reasonable & customary fees. This is a contract rate often disguised in the form of "appraisal volume" but is nothing short of taking a cut of the reasonable & customary fee for such intermediary services the AMC provides.

Sincerely

Steven A. Hall