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Comments:

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Docket No. R-1394 and RIN No. AD-7100-56 "Customary and reasonable fees" for appraisers cannot and should not be based on recent fees paid to appraiser's by AMC's due to the forced lower compensation while requiring additional documents to be completed within each report. These additional items require an excessive amount of time and at the same time not addressing the most important part of an appraisal "VALUE". Current customary fees should reflect the additional work required in addition to former reasonable fees prior to HVCC. Independent studies from appraisers must be used with VA as a guide. Most of these AMC companies do not have "AREA competency" which is not a requirement for them but necessary for appraisers. Many times the reviewers from these companies are located outside of the United States of America. These same companies appear to have specific BANK affiliations but not disclosed.