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Comments:

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The Customary and Reasonable fee paid to appraisers must not be influenced by the biased group of Appraisal Management Companies who should be compensated and borne by the lenders who receive the reduced liability and services of the AMC. Appraisers cannot be paid a split of the service fee when the costs and liability is borne solely to the educated professional appraiser. The amount of work the AMC puts into a single assignment is minimal and pay should always be commensurate to the job. The business model is solely to protect lenders and therefore the cost must be borne to the lenders as many have reduced staff and are not properly paying the professional appraiser by way of AMC. A fair and balanced fee should be determined without AMC involvement and any disputes raised by AMC's should be seen as biased and not given consideration allowing for a full investigation into this dilemma. An appraiser must maintain credentials, memberships, insurances as well as vehicles, fuel and equipment to produce appraisal reports and the cost for these basics are now greatly increased. The industry as a whole is in decline due to these restrictions to free market principles as the AMC'S can concur to not provide work to whom they choose making their use anti-free market middle persons to a profession. I have personally experienced this situation as AMC's hold the only real portal to work in the industry. If AMC's are to remain an integral part of the Lenders liability protection and servicing then the cost is theirs naturally and the AMC's should have no say as to what an appraisal should be priced at only what they have experience in the job of passing the work to appraisers to do and the costs associated with that and only that as they hold no certifications or education pertaining to the valuation of real estate. This cost then must be passed on to the true user the Lender which insulates them from liability and previously needed personnel. Please enforce the C & R fees as should be with a unbiased view into what fees should be to sustain the industry standards.