

From: Marianne W. Palen  
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Comments:

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Name: Marianne W Palen

Affiliation: NAIFA

Category of Affiliation: Other

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

It is iimportant that "reasonable and customary fees" are determined by objective sources and are based on fees charged by other than AMC's. Prior to the HVCC, appraisal fees were pretty based on free market competition. The restrictions created by the HVCC resulted in a significant drop in fees paid to appraisers by the AMC's. Another factor to consider is that about the same time, the new 1044 Market Condidtions Addendum was instituted. Most appraisers charged an additional fee to complete this form. Pre-HVCC fees would not reflect this additional cost. Thank you for considering my comments.