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Comments:

Please don't let the appraisal managment companies dictate what reasonable and customary fees are. They are for the most part, charging the borrower's up to two times more than what the fees used to be before the HVCC. And most of them are trying to pay the Appraiser less than half of the fee they are charging the borrowers. For example, one AMC, that is owned by one of the nation's largest banks, is charging its clients \$550 for a standard appraisal, and expecting to pay the Appraiser \$275. It should be noted that appraisals now take much longer than they used to as well, before the HVCC. There are several new required forms and comments that lenders want. If there is going to be a mandate for Customary and Reasonable, then it should take into consideration that these appraisals take much longer than they used to. Quality Appraiser's will continue to flee the industry and find other things they can be paid for in consideration of their time and expertise, if the new status quo (post HVCC AMC fees) continues. This will add to the further decline of quality and trustworthiness of Appraisals. Not to mention that the borrowers are currently paying far more money for an Appraisal, while not getting a quality product.