

From: Gray Appraisal Service, David J. Gray
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Comments:

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Comments:

Regarding the "customary and reasonable" fees for appraisers. Please know that since the inception of AMCs fees have been in a downward spiral for appraisers. AMCs take a significant portion of the appraiser's fees and provide little, or no, service. When calculating customary and reasonable fees, the fees paid by AMCs should be excluded from any survey. The VA's fee schedule should be considered and a statistical average of fees on the HUD 1 over a period of time should be considered. AMCs appear to be engaged in price fixing and discouraging fair market competition. Thanks for your kind consideration. Dave Gray Certified Residential Appraiser Gray Appraisal Service