

From: Anonymous  
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Comments:

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Comments:

To Whom it May Concern: I am submitting this comment anonymously due to concerns of being black listed by various management companies. I think utilizing the VA schedule in conjunction with recent fee surveys for determining customary and reasonable fees makes total sense. Dodd-Frank states that AMC fees are not to be used as examples of customary and reasonable fees, as we all know, they are not reasonable. Another approach would be to separate and identify fees paid to the AMC and appraiser, resulting in a more equitable dispersion of the appraisal cost. As a Certified General Appraiser with 11 years of experience, I am considering leaving the appraisal industry after many years of study and hard work, as it is becoming difficult to make a decent wage in a reasonable work week. The lack of appraiser independence, along with an unsustainable living wage, is forcing the most experienced appraisers to leave the business, which is a huge loss to consumers and overall financial market protection. Thank you for your consideration in this matter