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Comments:

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Comments:

The comment focuses on customary and reasonable fees for real estate appraisers. I think customary and reaonable fees should be left to the market to decide. Frankly the average fee for an appraisal has decreased since 1993 while the reporting comments, continuing education, and demand for delivery has increased considerably. The overall affect is a reduction in the quality of the appraisal reporting particularly in today's uncertain marketplace. There needs to be better methods that require lenders and AMCs to engage higher quality appraisers and to pay those appraisers at a level commensurate with the degree of professionalism and quality of reporting now supposedly desired by these lenders and AMCs.