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Comments:

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The public has been paying inflated fees for less appraisal services than prior to the implementation of HVCC. Locally reasonable fees in no way are reflected by those paid by AMCs. Even VA fees are below the local norms in my market areas, but close enough that I am willing to continue such work for the benefit of our Veterans and to do work without dealing with AMCs and their inferior pay scales. I presently am doing a very complex assignment for \$550 which I quoted \$850 but was offered \$300 by the AMC. Weekly, I receive calls from AMCs requesting quotes for assignments, only to be offered the assignment for 30-60% of the quote. "Transparency" is the popular phrase being tossed about by government these days. Transparency MUST be brought into the mortgage appraisal process. Any AMC fee should be a separate line item on the HUD as well as true ownership of the AMC. Many larger lenders have formed their own AMC to handle appraisals since it becomes another profit source. If truly transparent and understood by the consumer for what it actually is - a kickback of the appraisal fee to the lender, these would be outlawed.