

From: Kevin A. Spellman  
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Comments:

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Name: Kevin A Spellman

Affiliation:

Category of Affiliation:

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

There has been unjust enrichment by the AMC for years. The AMC business model is to use the least cost service-provider and then re-sell a PDF file to a lender and make the service provider wait for the partial payment of services. The chicken did come first in this scenario and there are several rotten eggs amongst the AMC. LSI, Quantrix and E-AppraiseIT , First American are just some if they still exist. The government has the duties to protect the consumer. This is an opportunity to demonstrate the public trust that most if not all appraisers have and the AMC's I have listed do not. This act should in spirit be for consumer protection. The appraiser can carry this spirit in his or her daily duties. The AMC do not and cannot possess this spirit. Their business model cannot make room for customary and reasonable fees along with the promotion of public trust and stay in business. The typical, customary appraisal fees should stay local and with the appraisers. An appraisal fee should not be exported out-of-state and possibly out of the country. There is a graying of our industry and we are losing time and dollars to prepare for retirement or possibly train a new generation of appraisers. The AMC business-model does not train appraisers. No appraiser could train an appraiser with an AMC dictating the fees and then consuming most of the fee. I ask you to stop the AMC unjust-enrichment and from consuming the typical appraisal fee. There are several AMC that do not pay the appraisers and they are economic terrorists. The AMCs have been operating in the wild, wild-west. I'm glad to have a new sheriff in town and this new regulation can give the sheriff more authority. The appraisers need this regulation and this protection. There is also enrichment for the government with this new regulation, appraisers pay weekly, monthly and quarterly in taxes and these dollars could return the government faster than through the AMCs that are excused from paying state taxes as most do not pay state taxes where the appraisers operate there services. Thank you for the opportunity to comment from a graying appraiser here in MA.