

From: Beth Aquilizan  
Proposal: 1486 (7100-AE15) Minimum Requirements for Appraisal Management Companies  
Subject: Minimum Requirements Appraisal Management

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Comments:

Hello -

Related to Question 2, there have been comments related to distinguishing between an Appraiser Panel for an AMC from appraisers working for a traditional appraisal firm to avoid capturing the traditional appraisal firm. I agree with the intent, but fear that an unintended consequence of defining a traditional appraisal firm as one with W-2 employees only would be limiting to "traditional" appraisal firms in the future. As commented on by the submission from the Appraisal Institute and the American Society of Farm Managers and Rural Appraisers, there are not currently enough new appraisers coming into the field to sustain need. A definition of a traditional appraisal shops as one employing all workers as W-2 employees would eliminate them from utilizing a number of appraisers (over 15) for a one-time assignment for a large job from a client which would require that many contributors.

Related to Question 6, I feel that the comments submitted by NAA and by Dori Davis are well-thought out and equitable and encourage you to follow those suggestions.

Thank you,  
Beth Aquilizan