

From: Jerry M. Allen
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Comments:

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Name: Jerry M Allen

Affiliation: Appraisal Institute

Category of Affiliation: Commercial

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

Regarding the reasonable and customary fees for appraisers, I fully support the VA price list. Fees now paid by AMCs across the country, foster poor effort and minimal work on an appraisal. When it should take 4-6 hours (at least) do to the job correctly, with the right research, confirmation, and analysis, it is unreasonable to expect someone making \$200-\$250 to give it their best. With the education and experience required to become licensed or certified, the appraiser is not just someone who takes pictures and measures homes but, a technical analyst. With the back office scrutiny that goes into an appraisal review, developing the original report is not a sport for amateurs. It is time that the professional appraisers received just compensation for the work, education, and diligence that it takes to do the job correctly. If the HVCC hadn't changed things, we wouldn't have lost 25% of appraisers nationwide, to other jobs or unemployment. Currently, there is no mechanism for replacing these lost workers as no one wishes to hire a trainee. No incentive for absorbing the risks. The numbers of appraisers just keeps shrinking with no end in sight. If AMCs wish to keep earning the same fees that they charge currently, allow them to add them to the appraiser's fees as a straight pass through and tell the consumers exactly what they are paying for and to whom. Appraisers need to receive fair compensation for the work that they do and we are relying on the TILA to stabilize the market for us, and help the economy, the consumer, and the mortgage industry. Thanks, Jerry M. Allen Certified Residential Appraiser San Diego