

From: [REDACTED]
Sent: Thursday, December 21, 2017 9:45 AM
To: James R. Park <jim@asc.gov>
Subject: Appraisal Waivers

Mr Park,

I am an appraiser that works in a remote area. If the banks that are requesting waivers typically order their appraisals through appraisal management companies, then they are part of the problem. I have relationships with a handful of direct order lenders who get priority in my workload. I accept appraisal orders from direct lenders 95% of the time as I am assured that my appraisals are being reviewed by qualified people. I accept around 20% of the orders offered to me through appraisal management companies. When I consider accepting an AMC order, I have to consider the unnecessary correction requests made by unlicensed, unqualified reviewer/QC employees, the possibility of AMC insolvency which leads to me not being paid as well as always having to counter my appraisal fee or submit a fee and turn time in hopes that I am both the cheapest and quickest. If I have 5 or 6 direct lender jobs on my desk, sometimes I won't even bother with the AMC orders. There is no shortage of appraisers, there is a shortage of appraisers who care to deal with the appraisal management companies.

Thank you for your time. Feel free to call or email me if you ever want to discuss anything appraisal related. I'm always willing to share my opinion!!

Happy Holidays!

Sincerely,

[REDACTED]