

**From:** [REDACTED]

**Date:** January 3, 2018 at 7:17:51 PM EST

**To:** "jim@asc.gov" <jim@asc.gov>

**Subject:** Appraisal shortage

I am a residential appraiser in the state of Connecticut and am very concerned about reports of banks applying for waivers for appraisal reports completed by licensed appraisers under the guise of an "Appraiser shortage". I understand the original intent of Dodd Frank and the requirement of third party ordering which makes sense in preserving appraiser independence and to prevent lenders from black listing appraisers for not making value. A large number of the AMC's operating today have hijacked the profession and demand that professionally licensed and trained appraisers work for fees under \$250 while keeping a larger percentage of the appraisal fee charged to the lender for their "service fees". Most decent appraisers refuse to work for these low ball fees and opt to only work for banks or AMC's who treat Appraisers in a professional manner. Blasting out appraisal orders to hundreds of appraisers at a time or requesting appraisers bid on jobs and selecting only those who will work for the cheapest fees is not acceptable. The appraisers who provide the best work products and best reports with quality data should be what lenders are looking for. We need lenders to stand up and demand better service and top notch appraisal reports. There is no appraiser shortage, simply a limited number of appraisers willing to accept low ball fees and unprofessional treatment from AMC's. Please do not support the appraisal waivers requested by these lenders and instead fight for oversight of AMC's and demand that the original intent of the law be revisited and unscrupulous AMC's who only care about their bottom line be banned from the business. Homeowners, lenders and Appraisers all deserve much better that what they are receiving from the current system.

Sincerely,

[REDACTED]

residential Appraiser