

To Whom It May Concern:

Although I do understand you're intended application of appraisal ordering independence I seriously feel this is addressing the problem the wrong way. The main cause for my concern is the "Appraisal Management Companies" that are in the business, or will be coming in the business, of ordering real estate appraisals. It does establish the independence of ordering the appraisal but does not remedy the problem at hand. It just introduces one more business entity into the equation that is not protecting the consumer. The appraisal management companies are quoting their appraisal fees for what they will be paying the appraiser, or in essence price fixing, and driving down the appraiser's fee. The end result will be that you have less experienced appraisers going after this business and thus results in an inferior work product or less reliable appraisal. Also, in most cases the appraisal management companies demand certain time constraints on the appraiser in which they must perform their work such as a 24 hour turn around time. This also contributes to an inferior work product.

I see this already happening in my geographic area and it is such a shame to see what I thought was a professional industry. Please give more thought to this situation as we already have an industry standard in place created by Congress in the form of the Appraisal Standards Board that promulgates the Uniform Standards of Professional Appraisal Practice (USPAP). The answer would be to enforce the State Boards to discipline the appraisers violating USPAP that are ruining, or have already ruined our industry.

Respectfully Submitted,

Christopher L. Brookshire, GAA/RAA
Managing Appraiser
Real Estate Advisory Services, Inc.

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