



## Reasonable & Customary Fee Information (Updated March 31, 2011)

Lenders & Appraisers:

Some of you may have questions regarding AMC Links approach to compliance regarding the “ Reasonable & Customary” fee issue accelerated by Dodd Frank and effective 04/01/2011.

The basis of our approach is centered on the first presumption of compliance. Our initial appraiser compensation offer is based on an amount reasonably related to recently accepted rates for similar appraisal services in the subject property market area. If the subject property type, scope of work or expected turn time warrant consideration for a higher or lower compensation the appraiser has the ability to communicate those contributing factors to AMC Links so that we have an opportunity to take those factors into consideration and adjust the proposed appraiser compensation accordingly. See below the data that is shown to an appraiser before acceptance and also dynamically stamped in the engagement letter for AMC Links documentation purposes.

**Customary and Reasonable Fee Compliance-** The proposed appraiser compensation for this assignment is being offered to you **after considering multiple Dodd Frank compliant contributing factors.** Our proposed fee is offered in good faith and is **reasonably related to recent rates paid for similar services in the subject geographic market area.** You as the appraiser, have the ability to negotiate a higher or lower rate after considering and communicating with AMC Links regarding the **subject property type, scope of work, expected turn time, appraiser credentials and quality of work.** The proposed appraiser compensation for this assignment opportunity is being offered in good faith and is a free market decision. If you as the appraiser feel that the subject property type and scope of work justify a higher or lower compensation rate please select ‘decline due to compensation’ and indicate the amount of increase or reduction of compensation rate along with your explanation of the applicable contributing factors involved. Your choice has no impact on eligibility for this assignment opportunity or any other future business. We must have a copy of your W-9 uploaded into your profile in order to process payment for this appraisal.

After considering the above noted basis to our approach to compliance and comparing that approach with the below cut & paste from Dodd Frank interim final rule acceptable approach to compliance we feel we have taken the appropriate steps to ensure we are consistent with an acceptable compliant approach in determining a “ Reasonable & Customary” appraiser compensation rate.

*Customary and reasonable rate of compensation for fee appraisers.* Under the interim final rule, a creditor and its agent must pay a fee appraiser at a rate that is reasonable and customary in the geographic market where the property is located. The rule provides two presumptions of compliance. Under the first, a creditor and its agent is presumed to have paid a customary and reasonable fee **if the fee is reasonably related to recent rates paid for appraisal services in the relevant geographic market,** and, in setting the fee, the creditor or its agent has: **• Taken into account specific factors, which include, for example, the type of property and the scope of work;**