Board of Governors of the Federal Reserve System   Chris Barnard
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30 August 2016

- **12 CFR Part 226**
- **Docket No. R-1443**
- **Appraisals for Higher-Priced Mortgage Loans Exemption Threshold**

Dear Robert deV. Frierson.

Thank you for giving us the opportunity to comment on your Proposed rule and request for public comment on Appraisals for Higher-Priced Mortgage Loans Exemption Threshold.

The OCC, the Board and the Bureau are publishing proposed rules amending the official interpretations for their regulations that implement section 129H of the Truth in Lending Act (TILA). Section 129H of TILA establishes special appraisal requirements for "higher-priced mortgage loans" (HPMLs) in these agencies' regulations. The Agencies[1] issued joint final rules implementing these requirements, effective January 18, 2014. The Agencies' rules exempted, among other loan types, transactions of $25,000 or less, and required that this loan amount be adjusted annually based on any annual percentage increase in the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W). If there is no annual percentage increase in the CPI-W, the OCC, the Board and the Bureau will not adjust this exemption threshold from the prior year. The proposal would memorialize this as well as these agencies' calculation method for determining the adjustment in years following a year in which there is no annual percentage increase in the CPI-W.

I generally support these proposed rules, which are sensible and in line with the intent of the Dodd-Frank Act. The proposed rules will ensure regulatory consistency and promote efficiency and reduce costs, without loss of amenity in any other regulatory area.

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[1] OCC, Board, Bureau, FDIC, NCUA and FHFA

<u>Please note that the comments expressed herein are solely my personal views</u>

Yours sincerely

C.R.B.

Chris Barnard