

Proposal: 1639 (7100-AF30) Real Estate Appraisals

Description:

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Comment ID: 133125

From: United Appraisal Services, LLC, Barry Levine

Proposal: 1639 (7100-AF30) Real Estate Appraisals

Subject: R-1639 - Real Estate Appraisals

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Comments:

NONCONFIDENTIAL // EXTERNAL

Re: Real Estate Appraisal - Docket ID OCC-2018-0038

FDIC RIN 3064-AE87

Good Afternoon,

The Federal Deposit Insurance Corp., the Office of the Comptroller of the Currency and the Board of Governors of the Federal Reserve on Nov. 20 released a proposal to increase the threshold at which residential home loans require an appraisal to \$400,000 from \$250,000.

By increasing the residential appraisal threshold from \$250,000 to \$400,000, the FDIC would threaten the vital role that appraisers play in real estate transactions. This action would undermine the crucial risk mitigation services that appraisers provide clients and users of appraisal services. Reducing regulations may seem to make sense initially, but the FDIC's announcement raises significant safety and soundness concerns of financial institutions.

Removing an "independent" appraisal strikes me as a dangerous and slippery slope. Appraisers are one of the few checks and balances remaining. What's next? Removing title and escrow companies and allowing bank personnel to manage that as well? Utterly ridiculous. It is imperative that we keep the checks and balances in place to protect the consumers, most importantly, but also the many other related service providers that are essential to a real estate transaction.

With Kindest Regards,

Barry Levine

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