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Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551

January 20, 2009

Re: Docket No. OP-1338 Comments on the Proposed Interagency Appraisal and Evaluation Guidelines

Dear Ms. Johnson:

The proposed Interagency Appraisal and Evaluation Guidelines update and consolidate a number of bulletins, letters, and guidance accumulated over the years since the 1994 guidance, and the result is a cohesive and integrated set of guidelines.

We believe that the proposed guidelines do clarify the Agencies' real estate appraisal guidelines and promote safe and sound real estate collateral valuation across the banking industry spectrum, from smaller to larger institutions.

We appreciate the time and effort expended by the respective agencies. If you require any further comments or observations, please feel free to contact me.

Sincerely,

Dev Strischek  
Senior Vice President and Senior Credit Policy Officer  
SunTrust Banks, Inc.  
Atlanta, Georgia