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Comments:

Public Comments on Real Estate Appraisals:

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Comment:

The Appraisal Foundation is authorized by Congress to establish minimum appraisal standards and appraiser qualifications for appraisals used in federally related financial transactions. We appreciate the opportunity to comment.

The Appraisal Foundation believes that increasing the appraisal threshold levels from \$250,000 to \$400,000 would negatively affect safety and soundness in real estate lending practices. It would likely prompt many financial intuitions to significantly reduce attention to collateral risk management. This position is supported by the Government Accountability Office (GAO) report in January 2012, where no support was found to raise the current threshold amount. In fact, that GAO report reflected stakeholder support to reduce or eliminate the current threshold.

An appraisal performed by a licensed or certified appraiser that complies with the Uniform Standards of Professional Appraisal Practice is a lynchpin in the proper evaluation of real estate collateral. To maintain and promote proper risk management, safety and soundness policies, and consumer protection, The Appraisal Foundation urges you not to raise the current appraisal threshold amount.