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Comments:

Public Comments on Real Estate Appraisals:

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Comment: The raising of the appraisal threshold on commercial real estate would not reduce malfeasance in appraisals and banking. Regulations that loosen oversight on property values allows for more deception. It also allows the market to not appropriately mark properties to a value that would be seen as a reputable representation in a current market. Appraisals are already a loose foundation and allowing real property collateral that is consistent with safe and sound banking practices makes a loose foundation looser.