

Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
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United States
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Chris Barnard

23 May 2020

- **12 CFR Part 225**
- **Docket No. R-1713**
- **Real Estate Appraisals**

Dear Ann E. Misback.

Thank you for giving us the opportunity to comment on your interim final rule concerning Real Estate Appraisals.

The OCC, Board, and FDIC (collectively, the agencies) are adopting an interim final rule to amend the agencies' regulations requiring appraisals of real estate for certain transactions. The interim final rule defers the requirement to obtain an appraisal or evaluation for up to 120 days following the closing of a transaction for certain residential and commercial real estate transactions, excluding transactions for acquisition, development, and construction of real estate. Regulated institutions should make best efforts to obtain a credible valuation of real property collateral before the loan closing, and otherwise underwrite loans consistent with the principles in the agencies' Standards for Safety and Soundness and Real Estate Lending Standards. The agencies are providing this relief to allow regulated institutions to expeditiously extend liquidity to creditworthy households and businesses in light of recent strains on the US economy as a result of the National Emergency declared in connection with coronavirus disease 2019 (COVID-19).

I fully support the proposed changes, which will allow businesses and households to have speedy access to liquidity from real estate equity. Naturally, regulated institutions must obtain the appropriate appraisal or evaluation that is consistent with safe and sound banking practices by the end of the deferral period.

Please note that the comments expressed herein are solely my personal views

Yours sincerely

C.R.B.

Chris Barnard