Proposal: 1809 - Interagency Guidance on Reconsiderations of Value of Residential Real Estate

Valuations

Description:

Comment ID: 154666

From: Bank of Labor, Robert McCall

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Subject: Interagency Guidance on Reconsiderations of Value of Residential Real Estate

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Comments:

Date: Jun 12, 2023

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Revision: 1
First name: Robert
Middle initial: K
Last name: McCall

Affiliation (if any): Bank of Labor Affiliation Type: Commercial (Com) Address line 1: 11810 W. 75th St.

Address line 2: City: Shawnee State: Kansas Zip: 66214

Country: UNITED STATES

Postal (if outside the U.S.):

Your comment: Bank of Labor supports the interagency working together to deal with residential appraisals that do not represent the market value of homes that are the subject of a request for financing. In your Statement, it would be most helpful to provide several examples of mistakes residential appraisers make along with recommendations for how an FI can stay within the range of expectations of the guidelines and arrive at a more favorable and supportable value..