



## SECURITY BANK

June 1, 2014

Robert E. Feldman  
Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, DC 20429

Re: Minimum Requirements for Appraisal Management Companies for the FDIC RIN 3064-AE-10

Dear Mr. Feldman:

There are two areas in the definitions that I wish to comment on. Our bank utilizes an AMC registered in our state where the vast majority of our collateral is located. On rare occasions we have a borrower wanting to pledge a piece of real estate located in another state. We do not have the expertise outside of our loan department to perform this function internally while complying with the appraisal independence requirements in the Interagency Guidelines. We would like to use our AMC to help us find an appraiser and provide us with a review of this appraisal however the registration fees, well into the thousands of dollars in some states, prevent our AMC from being able to provide us with this service.

Specifically in the definition of Appraiser Panel the wording "or 25 or more nationally" compels our local AMC to register in another state for one assignment. In the definition of Appraisal Management Services "(4) reviewing and verifying the work of appraisers" precludes us from having our AMC provide us with an appraisal review even if we are able to procure the appraisal through internal staff. Interagency Guidelines indicate that risk is increased with "properties outside the institution's traditional lending market" necessitating an appraisal review.

Sincerely,

Larry Moore,  
Senior Vice President