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Submitted via email – comments@FDIC.gov

Federal Deposit Insurance Corporation (FDIC)  
RIN 3064-AE56

Office of the Comptroller of the Currency (OCC)  
Docket No. OCC-2017-0011

Federal Reserve System (FRS)  
Docket No. R-1568 / RIN 7100 AE81

Re: Proposed rule to increase the appraisal threshold for commercial real estate (CRE) transactions from \$250,000 to \$400,000

Ladies and Gentlemen:

The following comments are submitted on behalf of the Independent Bankers Association of Texas (“IBAT”), a trade association representing nearly 400 independent, community banks domiciled in Texas. On behalf of our members we would like to thank you for the opportunity to comment on the proposal to increase the threshold at or below which appraisals would not be required for commercial real estate transactions from \$250,000 to \$400,000.

Many of our member banks operate in predominantly rural counties. In fact, of the 254 Texas counties, 177 are designated as rural counties. Many of the banks in those rural areas have struggled to find appraisers providing services in those counties. When an appraiser is found, the delay in receiving the appraisal can be months and the cost exorbitant. The recent impact of Hurricane Harvey along the Texas coast will only exacerbate problems.

As Texas community banks continue to recover from the recession and see loan demand grow, the lack of qualified appraisers in general, and their limited availability in rural areas, has the potential to stifle the local communities those banks serve.

We believe that the proposal to increase the threshold at or below which an appraisal is required on commercial real estate to \$400,000 will help reduce loan costs and minimize delays in the loan process due to lack of local appraisers without causing any threat to the safety and soundness of our member banks.

Thank you for the opportunity to comment on behalf of Texas community bankers.

Respectfully,

Christopher L. Williston, CAE  
President and CEO