

**From:** Judith Brandt

**Sent:** Wednesday, January 16, 2019 9:21 AM

**To:** [regs.comments@occ.treas.gov](mailto:regs.comments@occ.treas.gov)

**Cc:** [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov); Comments

**Subject:** Docket ID OCC-2018-0038 and RIN 3064-AE87 - Real Estate Appraisals

By increasing the appraisal threshold, a loss of public protection and confidence would be created. I was around for the flipping scandals of the 1990's, and it wasn't pretty. We are inviting opportunities for fraud and misrepresentation in real estate transactions.

By increasing the residential appraisal threshold from \$250,000 to \$400,000, FDIC would threaten the vital role that appraisers play in real estate transactions" said James Murrett 2018 president of the Appraisal Institute. "This action would undermine the crucial risk mitigation services that appraisers provide clients and users of appraisal services."

Increasing the threshold would be a great mistake, and will destabilize markets in some areas.

Judith Brandt

PA Residential Appraiser [REDACTED]