



January 22, 2019

via email to comments@FDIC.gov

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

Re: FDIC RIN 3064-AE87 – Real Estate Appraisals

Dear Secretary Feldman:

The California Bankers Association (“CBA”) supports the increase in the threshold level at or below which appraisals would not be required for residential real estate-related transactions from \$250,000 to \$400,000.

CBA shares the FDIC’s perception that the increase in this threshold will ease regulatory burden while maintaining appropriate safety and soundness standards, and likewise supports the use of real property evaluations that are consistent with safe and sound banking practices for transactions that fall below the threshold or that are otherwise exempt.

Because CBA believes that the answers to the FDIC’s more specific questions would vary from member institution to member institution, it is not addressing them here, but has asked interested members to respond individually to those questions as they see fit.

Very truly yours,

CALIFORNIA BANKERS ASSOCIATION

By: Martha Evensen Opich
Its: Vice President and Association Counsel