



November 27, 2018

Via Electronic Submission – www.regulations.gov

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
400 7th Street SW, Suite 3E-218
Mail Stop 9W-11
on Ave. NW Washington, DC 202219
Docket ID OCC-2018-0026
RIN 1557-AE48

Ms. Ann E. Misback, Secretary
Board of Governors
Federal Reserve System
20th Street & Constitution
Washington, DC 20551
Docket No. R-1621
RIN 7100-AF-15

Robert E. Feldman, Executive Secretary
Attn: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
RIN 3064-AE90

RE: Regulatory Capital Treatment for High Volatility Commercial Real Estate Exposures

To Whom It May Concern:

The American College of Real Estate Lawyers (ACREL) is the premier organization of U.S. real estate lawyers. The American College of Mortgage Attorneys (ACMA) is the premier organization of mortgage law and real estate finance counsel in the United States, Canada and the Americas. Members in both organizations are distinguished, nationally-known lawyers elected to fellowship based on outstanding legal ability, experience, high standards of professional and ethical conduct, commitment to both their profession and to improving and reforming laws and procedures affecting real estate law and real estate secured transactions.

The Capital Markets committees of both ACREL and ACMA have reviewed the November 26, 2018 letter from the Real Estate Roundtable and are pleased to inform you that we support the position of Real Estate Roundtable as described in its letter.

Sincerely yours,



Jonathan Thalheimer

Vice Chair and Incoming Chair of the ACREL Capital
Markets Committee

Co-Chair ACMA Capital Markets Committee