

Public Comments on Regulatory Publication and Review under the Economic Growth and Regulatory Paperwork Reduction Act

FR Document Number: 2015-32312

Publish Date: 12/23/2015 12:00:00 AM

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Comment: I oppose the FDIC raising of the DeMinnus from \$250,000 to \$500,000 for an appraisal, as this increase would have an adverse impact on the real estate market through increased risk for the consumer, banks, and mortgage lenders.,

The majority of residential real estate appraisals that I perform are below the proposed \$500,000 threshold. The increased risk would be detrimental to the majority of consumers (buyers and sellers) in the residential real estate market. Valuations of properties through sources with no professional standards and no professional valuation training is not prudent risk management and could further destabilize the real estate market.

"This position is supported by a previous Government Accountability Office (GAO) report which found no support to raise the current threshold and, in fact, reflected stakeholder support to reduce or eliminate the current threshold."

"A recent survey of bank chief appraisers and appraisal managers which found that within that group 76.6% disagreed with raising the DeMinimus; 87.5% disagreed with raising the \$1,000,000 commercial real estate threshold; 89.1% agreed that raising threshold levels could increase risk to lenders; and 80.5% agreed that raising the threshold could increase risk to borrowers."