



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 & Constituti 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

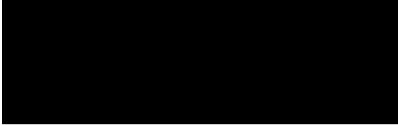
RE: Regulatory Capital Treatment for High Volatility Commercial Real Estate Exposures

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