

From: Bryan Thomas
To: [Regulatory Comments](#)
Subject: Bryan Thomas comments on Proposed Rule part 722, Real Estate Appraisals
Date: Monday, September 24, 2018 5:37:23 PM

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To Whom It May Concern,

Thank you for the opportunity to comment on the National Credit Union Administration proposed rule amending real estate appraisal requirements for certain transactions. Providing these amendments/regulatory relief would provide better clarity and access to credit for consumers. This proposed rule is exactly the “common sense” approach that NCUA specifies in their messaging. The NCUA should approve the following as it relates to Real Estate Appraisals (Part 722):

1. Increasing the threshold for required appraisals in non-residential real estate transactions from the current \$250,000 to \$1 million;
2. Reorganizing the appraisal regulation to make it easier to determine when a written estimate or an appraisal is required; and
3. Incorporating the rural exemption contained in the Economic Growth, Regulatory Relief, and Consumer Protection Act, S. 2155.

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