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To: [Regulatory Comments](#)
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I recently became aware that the National Credit Union Administration (NCUA) has proposed quadrupling the appraisal threshold level to \$1M for commercial loans made by credit unions. I am vehemently opposed to this legislation for the following reasons:

1. As a real estate appraiser for 30+ years I have witnessed firsthand the lack of oversight by local credit unions in the Philadelphia SMSA with untrained and inexperienced commercial loan credit analysts.
2. The majority of the credit unions in the Philadelphia SMSA have limited or no checks and balances regarding the selection, ordering and review of appraisal reports. The quality standards should be increased, not decreased.
3. The majority of the borrowers seeking commercial loans from credit unions are not experienced commercial/industrial Real Estate owners or investors and eliminating appraisals for loans under \$1 million will allow poor purchase decisions and overstated value estimates by property owners to be accepted.
4. Finally, has everyone forgot how the last mortgage crisis had impacted the US economy?

This is absurd.

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