

**From:** Ted Douglas  
**To:** [Regulatory Comments](#)  
**Subject:** Proposed Rule part 722, Real Estate Appraisals  
**Date:** Tuesday, November 6, 2018 11:21:37 AM

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## RE: Proposed Rule part 722, Real Estate Appraisals

As a 30 plus year real estate appraisal professional, I strongly urge NCUA to reconsider the proposed increase in the appraisal threshold to \$1,000,000. As an appraiser who manages and reviews hundreds of appraisals per year there are a significant number of purchase transactions contracted well below the \$1,000,000 threshold that are not supported by market data. This most often happens on the smaller transactions less than \$1,000,000 where professional brokerage representation is not prevalent on one or both sides of the transaction.

Buyers of real estate should have an independent opinion of value presented prior to entering into a sales contract that can potentially jeopardize their business and future livelihood. Enacting this very high appraisal threshold will create significant future foreclosure risk to the Credit Unions loaning on these transactions. This would be similar to the no income verification lending adopted during the last banking crash in 2008.

On behalf of the public trust please reconsider this risky proposal.

Thank you for considering our concerns.

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