

**From:** Detlef Weiler  
**To:** [Regulatory Comments](#)  
**Subject:** Appraisal Threshold Comments  
**Date:** Monday, December 3, 2018 3:51:47 PM

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Dear NCUA members,

I am writing to urge you NOT to approve the proposal to increase the appraisal threshold to \$1,000,000. Appraisers are the only individuals in the lending process who have no interest in the outcome of the transaction. Appraisers provide unbiased opinions of market value to verify that there is adequate collateral for the loan. Additionally, it is misleading to assume that smaller loans will somehow have less risk, when there will be no basis for determining the adequacy of the collateral once the appraisal requirement is eliminated. Default on 2 or 3 small, poorly underwritten loans can easily exceed the loss of a property collateralize single loan of similar value.

By the way, while an appraiser writing to you for lower appraisal thresholds may seem self serving, demand for appraisal services actually increases when loans default and properties face foreclosure. I have been appraising since 1985 and the recent recession was my busiest time ever. The weakening of appraisal requirements is short sighted and merely increases the long-term risks to financial institutions.

Thank you for your time and consideration,

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