

From: Gregory Laikind
To: [Regulatory Comments](#)
Subject: Threshold
Date: Friday, November 30, 2018 9:50:41 PM

I am deeply concerned about the threshold increase to \$1,000,000.

I am a Certified General Real Estate Appraiser in Michigan (license #1201070700) and work as the Collateral Risk Manager for a CUSO, ordering and reviewing valuations for credit unions throughout Michigan.

Alternative valuation methods (Commercial Evaluations and Broker Opinions of Value) have proven almost universally useless in my experience, and I have reviewed hundreds.

It is imperative that we retain competent valuations for the sizable volume of commercial lending below \$1,000,000. The FDIC has adopted and increase to \$500,000, and I implore you to follow their suit and rather than exceed that amount to \$1,000,000.

I would be more than happy to discuss this issue formally.

Kind regards,

Gregory Laikind