

From: Jeffrey T. Miller
To: [Regulatory Comments](#)
Subject: Real Estate Appraisals
Date: Friday, November 30, 2018 9:39:15 PM
Attachments: [image001.png](#)

Please do not increase the threshold.

Increasing the threshold will lead to another tax payer backed recession.

Sincerely,

Jeff

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From: The Appraisal Institute <brodgers@appraisalinstitute.org>
Sent: Friday, November 30, 2018 7:29 PM
To: Jeffrey T. Miller <jmiller@valbridge.com>
Subject: Last Chance to Tell the NCUA Not to Increase the Appraisal Threshold to \$1,000,000!

The National Credit Union Administration on Oct. 3 released for public comment its proposal to increase the appraisal threshold level for non-residential loans to \$1 million, up from \$250,000. The proposal also incorporates the rural exemption from appraisals found in the regulatory reform package signed into law earlier this year.

The Appraisal Institute sees this proposal as likely setting up an "arms race" between the NCUA and the federal banking agencies, which recently increased the appraisal threshold to \$500,000. If adopted, the federal banking agencies would face great pressure to establish a corresponding threshold level - despite having more experience with commercial real estate risk issues and having already studied the issue for years before settling on the \$500,000 threshold level earlier this year. Nearly all Small Business Administration loans would then be subject to a no-appraisal or evaluation loophole.

AI, along with other appraisal organizations, is submitting comments on the proposal, and encourages all AI professionals to do the same by the **Monday, December 3rd** comment deadline. Please share any experiences with credit union clients in commercial real estate or business lending. The NCUA accepts comments via email to: regcomments@ncua.gov. Include "Real Estate Appraisals" in the Subject line, and keep in mind, the NCUA posts all received comments to the agency's website for the public to view.

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