

From: Jason Ward
To: [Regulatory Comments](#)
Subject: Real Estate Appraisals
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I urge the NCUA to reconsider the proposal to increase the appraisal threshold level for non-residential loans to \$1,000,000 from \$250,000. As a commercial property appraiser I obviously have a financial stake in this issue as thousands of commercial appraisers like me perform these types of assignments on a daily basis. However, as someone who owned a commercial appraisal firm through the last financial crisis, this loosening of appraisal requirements will eventually lead to catastrophe far outweighing the proposed small monetary and questionable time benefits to lenders and buyers. The current requirements protect the majority of commercial property owners, lenders, buyers, and sellers from fraud and provides a valuable resource to the broader banking system. The hiring of an appraiser forces due diligence by the banks and the buyer in the form of gathering and providing the appraiser with the necessary documents to properly value the property. It also provides a neutral set of eyes on the property that is trained to identify valuation issues that are unidentifiable without an expert eye. Appraisals bring transparency and accountability to the process. Do we really want less of that in the financial industry to save a limited amount of time and money? Appraisals are worth the small extra cost, just like other functions performed during the purchase of a property. Retain the existing thresholds and keep the safeguards in place that bring trust, security, and stability to the commercial lending system.

Regards,

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