## Board of Governors of the Federal Reserve System Federal Deposit Insurance Corporation Office of the Comptroller of the Currency

February 7, 2019

John D. Russell Senior Director of Government Relations The American Society of Appraisers 11107 Sunset Hills Road, Suite 310 Reston, Virginia 20190

Stephen Frerichs
Government Relations Representative
The American Society of Farm Managers and
Rural Appraisers
720 South Colorado Boulevard, Suite 360-S
Glendale, Colorado 80246

Leo Regensburger National President The American Guild of Appraisers Post Office Box 553 Spencerville, Maryland 20868

Sehar Siddiqi Policy Representative The National Association of Realtors 500 New Jersey Avenue, Northwest Washington, District of Columbia 20001 Bill Garber Director of Government and External Relations The Appraisal Institute 122 C Street, Northwest, Suite 360 Washington, District of Columbia 20001

Stephen Sousa
Executive Vice President
MBREA
55 Court Street, Suite 540
Boston, Massachusetts 02108

Neil Shah Regional Managing Director, Americas RICS 60 East 42nd Street, Suite 542 New York, New York 10165

Re: Request for a Hearing on the Proposal to Increase the Residential Appraisal Threshold

## Dear Sirs and Madame:

Thank you for your letter, dated December 21, 2018, to the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency (collectively, "the agencies") requesting a public hearing on the proposal to increase the appraisal threshold for residential real estate transactions from \$250,000 to \$400,000. The letter requests a public hearing, no fewer than 30 days after the expiration of the comment period on February 5, 2019. Thank you as well for taking the time to speak with staff from the agencies in a conference call on January 17, 2019, concerning your request for a hearing.

As agency staff explained on the call, the notice and comment process affords all members of the public an opportunity to express their views on a proposed rulemaking. As part of this process, the agencies welcome written comments through a variety of channels. In addition, agency staff often meet with interested parties who prefer to express their views orally, on condition that these meetings become part of the public record. The agencies take all comments into consideration when moving forward in the rulemaking process.

After reviewing your letter and considering the discussion in our conference call, we do not believe that holding a public hearing would elicit relevant information that could not be conveyed through the comment process described above. While the agencies are, therefore, declining your request for a public hearing, we will carefully consider your written comments. As mentioned on the conference call, agency staff is available to meet with representatives of your organizations.

Should you have any further questions with regard to this issue, please contact: FDIC -Beverlea S. Gardner, Senior Examination Specialist, (202) 898-3640, or Benjamin K. Gibbs, Counsel, Legal Division, (202) 898-6726; Federal Reserve - Carmen Holly, Lead Financial Institution Policy Analyst, (202) 973-6122, or Matthew Suntag, Senior Counsel, Legal Division, (202) 452-3694; or OCC - G. Kevin Lawton, Appraiser (Real Estate Specialist) (202) 649-7152, or Mitchell Plave, Special Counsel, Law Department, (202) 649-5490.

Barbara Bouchard

Senior Associate Director

Division of Supervision and Regulation

Board of Governors of the Federal

Reserve System

Sincerely,

Doreen R. Eberley

Director

Division of Risk Management Supervision

Federal Deposit Insurance Corporation

Grace Dailey

Senior Deputy Comptroller and Chief

National Bank Examiner

Office of the Comptroller of the Currency