

Alfred M. Pollard
Federal Housing Finance Agency
Eighth Floor, 400 Seventh Street, SW
Washington, DC 20024
United States
www.fhfa.gov

Chris Barnard

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- 12 CFR Part 1222; RIN 2590-AA61
- Minimum Requirements for Appraisal Management Companies

Dear Mr. Pollard.

Thank you for giving us the opportunity to comment on your joint notice of proposed rulemaking on Minimum Requirements for Appraisal Management Companies.

The OCC, Board, FDIC, NCUA, Bureau, and FHFA (collectively, the Agencies) are jointly proposing a rule to implement the minimum requirements in section 1473 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Dodd-Frank Act) to be applied by States in the registration and supervision of appraisal management companies (AMCs). The proposed rule also implements the requirement in section 1473 of the Dodd-Frank Act for States to report to the Appraisal Subcommittee of the Federal Financial Institutions Examination Council (FFIEC) the information required by the Appraisal Subcommittee (ASC) to administer the new national registry of appraisal management companies (AMC National Registry or Registry). In conjunction with this implementation of section 1473, the FDIC is proposing to integrate its appraisal regulations for State nonmember banks and State savings associations.

I generally support these proposed rules, which will strengthen governance and good industry practice. The scope covers appraisal management services in connection with consumer credit transactions secured by a consumer's principal dwelling or securitization of those transactions. This is appropriate and in line with the Dodd-Frank Act. I strongly support: proposed § 1222.23 on appraisal management company registration, which requires independent expert appraisers; proposed § 1222.25(a) concerning appraiser certification or licensing of owners; and proposed § 1222.25(b) concerning good moral character of owners.

Please note that the comments expressed herein are solely my personal views

These proposals will promote integrity and appraiser independence within Appraisal Management Companies in this space, improve governance thereon and act to reduce conflicts of interest.

Yours sincerely

C.R.B.

Chris Barnard