



August 22, 2012

Mr. Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA58
Federal Housing Finance Agency, Eighth Floor
400 Seventh Street, SW
Washington, DC 20024

Dear Mr. Pollard:

This letter is in response to the proposed rule on appraisals for Higher-Risk Mortgages. We ask that you review our comments with an open mind and take into consideration the toll this amendment will take on the Banking industry in our rural communities.

There is already a problem obtaining appraisals in small towns. First, there are few comparables for an appraiser to work with; second, the cost of a 1004 appraisal (as described in this proposal) is roughly \$450, which is a substantial cost of financing when the property costs \$30,000 and the loan is \$27,000. Such small loans require higher interest rates to be profitable for the lender, are kept in-house by the community bank, and are not part of property flipping schemes and all the other ills this proposal (and most of Dodd-Frank) aim to address.

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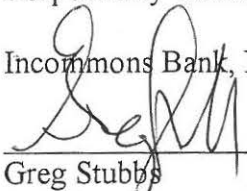
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Respectfully Yours,

Incommons Bank, N.A.



Greg Stubbs
President



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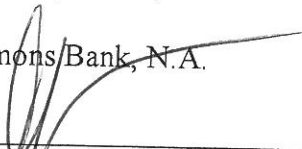
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Incommons/Bank, N.A.



Connie McGilvray
Secretary to the Board



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Incommons Bank, N.A.



Brad Butler
Executive Vice President/CFO



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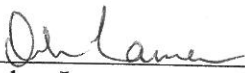
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Incommons Bank, N.A.



Debra Lawrence
Executive Vice President/CLO



You Have Our Word

August 22, 2012

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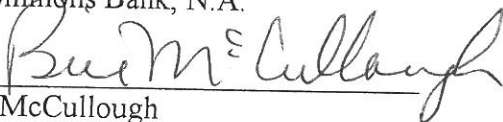
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Bill McCullough
Board Member



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Incommons Bank, N.A.

Raymond Hughes Dillard
Board Member



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A handwritten signature in cursive script that reads "Betty Stubbs". The signature is written in dark ink and is positioned above a horizontal line.

Betty Stubbs
Board Member