



VIA EMAIL ONLY

June 1, 2020

Chief Counsel's Office
Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street, S.W., Suite 3E-218
Washington, DC 20219
www.regulations.gov
Docket ID: OCC-2020-0014

Ann E. Misback, Secretary
Board of Governors of the Federal
Reserve System
20th Street and Constitution Avenue, N.W.
Washington, DC 20551
regs.comments@federalreserve.gov
Docket ID: R-1713; RIN 7100-AF87

Robert E. Feldman, Executive Secretary
Attention: Comments/RIN 3064-AF40
Federal Deposit Insurance Corporation
550 17th Street N.W.
Washington, DC 20429
comments@fdic.gov
Docket ID: RIN 3064-AF48

Re: Real Estate Appraisals Interim Final Rule; OCC Docket ID: OCC-2020-0014; FRB Docket ID: R-1713; RIN 7100-AF87; FDIC Docket ID: REIN 3064-AF48

Dear Sirs and Madams:

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing approximately 220 state and nationally chartered banks, savings banks, and savings and loan associations located in communities throughout the State. On April 17, 2020, the Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System (FRB), and Federal Deposit Insurance Corporation (FDIC) (the Agencies) published an interim final rule to amend bank regulations that require appraisals or evaluations of real estate for certain transactions. The agencies stated the intent of the interim final rule was to help provide regulatory relief to allow regulated institutions to expeditiously extend liquidity to creditworthy households and businesses in light of recent strains on the economy as a result of COVID-19. WBA appreciates the opportunity to comment on the Agencies' interim final rule.

The interim final rule defers the requirement to obtain an appraisal or evaluation for up to 120 days following the closing of a transaction for certain residential and commercial real estate transactions. The interim final rule excludes transactions for acquisition, development, and construction of real estate.

Through WBA's Legal Call Program, WBA has fielded many questions from bankers during this pandemic period related to real estate-secured transactions, including questions regarding appraisal and evaluation requirements. Based upon those questions, WBA has identified there is confusion in the industry over the meaning of the terms "acquisition, development, and construction of real estate" within the Agencies interim final rule. WBA requests the Agencies define the terms "acquisition, development, and construction of real estate" to provide greater clarity for financial institutions, and their customers. While balancing safety and soundness concerns, WBA recommends the definitions not be overly narrow so as to retain the greatest amount of flexibility for affected customers.



WBA appreciates the Agencies' proactive actions to identify the impact COVID-19 mitigation efforts, such as national and state stay-at-home and social distancing orders, have had on financial institutions in their efforts to comply with underwriting requirements and safety and soundness practices for transactions secured by real estate. WBA believes the Agencies' interim final rule has helped alleviate the bottleneck, and in some regions a freeze, in the access to appraisal and evaluation services. Such a shut-down could have had a devastating impact on creditworthy borrowers in need of liquidity as a result of the COVID-19 pandemic.

Once again, WBA appreciates the opportunity to comment on the interim final rule.

Respectfully,

A handwritten signature in black ink that reads "Rose Oswald Poels". The signature is written in a cursive, flowing style.

Rose Oswald Poels
President/CEO