



Indiana Credit Union League
The association of Indiana credit unions

January 24, 2020

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Re: NCUA Proposed Rule - Real Estate Appraisals RIN: 3133-AE98

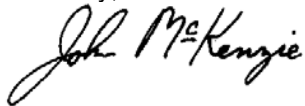
Dear Mr. Poliquin:

The Indiana Credit Union League (ICUL) appreciates the opportunity to submit comments on the National Credit Union Administration's Proposed Rulemaking for Part 722 - Real Estate Appraisals. The ICUL member credit unions represent 99% of assets and members of Indiana's credit unions, with those memberships totaling more than 2.6 million consumers.

The ICUL and our affiliated credit unions strongly support the proposal to increase the threshold level below which appraisals would not be required for residential real estate-related transactions from \$250,000 to \$400,000. We believe that it is important that credit unions not remain at a competitive disadvantage to other federally insured institutions whose regulatory agencies have already increased the threshold to \$400,000. The Consumer Financial Protection Bureau (CFPB) has also approved this increase for the other federal regulators. We encourage NCUA to develop and approve a final rule to increase the threshold as quickly as possible.

Thank you for the opportunity to comment on the proposed Real Estate Appraisals rule. We appreciate the desire of NCUA to be more flexible and to provide regulatory relief and ask that this continue to be the focus of new and proposed regulatory changes. If you have any questions about our letter, please do not hesitate to give me a call at (317) 594-5320.

Sincerely,



John McKenzie
President
Indiana Credit Union League