



NATIONAL ASSOCIATION OF REALTORS®

*The Voice For Real Estate®*

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**Charles McMillan, CIPS, GRI**  
*President*

August 14, 2009

The Honorable David H. Stevens  
Assistant Secretary for Housing - Federal Housing Commissioner  
US Department of Housing and Urban Development  
Washington, DC 20410

Dear Commissioner Stevens:

I am writing on behalf of the 1.2 million members of the National Association of REALTORS® (NAR) to request the Federal Housing Administration's (FHA) requirement of two appraisals in certain circumstances be rescinded. The National Association of REALTORS® is America's largest trade association, including NAR's five commercial real estate institutes and its societies and councils. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,400 local associations or boards, and 54 state and territory associations of REALTORS®. NAR has approximately 30,000 appraiser members from across the country and approximately 750 have earned our Residential Accredited Appraiser (RAA) and General Accredited Appraiser (GAA) designations.

In Mortgagee Letter 2008-09, released on April 1, 2008, FHA establishes a second appraisal requirement for properties that exceed \$417,000. The property must also be in a declining area where the loan-to-value (LTV) ratio, including upfront mortgage insurance premium, exceeds 95 percent. NAR believes this requirement imposes an undue burden on properties in the hardest hit markets, is redundant and increases the cost of the real estate transaction for the consumer. One appraisal, completed in accordance with the Uniform Standards of Professional Appraisal Practice (USPAP), should be sufficient to reflect the true value of a home.

Thank you for your time and consideration of this matter. NAR supports the independence of appraisers and the integrity of the appraisal process but we have concerns that the requirement of two appraisals may cause additional harm in certain markets. If you have any questions or concerns, or if I may be of service to you, please do not hesitate to contact me or our Senior Regulatory Policy Representative, Jerry Nagy, at 202.383.1233 or [jnagy@realtors.org](mailto:jnagy@realtors.org).

Sincerely,

A handwritten signature in cursive script, appearing to read 'Charles McMillan'.

Charles McMillan, CIPS, GRI  
2009 President, National Association of REALTORS®