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REALTORS®

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Office of the Comptroller of the Currency  
Docket No. OCC-2013-0009; RIN 1557-AD70

Board of Governors of the Federal Reserve System  
Docket No. R-1443; RIN 7100-AD90

National Credit Union Administration  
RIN 3133-AE21

Bureau of Consumer Financial Protection  
Docket No. CFPB-2013-0020; RIN 3170-AA11

Federal Housing Finance Agency  
RIN 2590-AA58

**Re: Appraisals for Higher Priced Mortgage Loans Supplemental Proposal**

Dear Ladies and Gentlemen:

On behalf of the one million members of the National Association of REALTORS®, I write to provide comments on the Supplemental Proposal on Appraisals for Higher-Priced Mortgage Loans put forth by the Office of the Comptroller of the Currency (OCC) and several other agencies.

The National Association of REALTORS® (NAR) is America’s largest trade association, including NAR’s eight affiliated institutes, Societies and Councils, five of which focus on commercial transactions. 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 represents a wide variety of housing industry professionals, including approximately 30,000 licensed and certified appraisers, committed to the development and preservation of the nation’s housing stock and making it available to the widest range of potential homebuyers.

NAR submits the following comments in response to specific questions raised by the Agencies proposing this rule:

**Question 12: Based on this information, the Agencies request comment and information concerning whether to require USPAP-compliant**



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**appraisals with interior property inspections conducted by a state-licensed or –certified appraiser for HPMLs secured by both a new manufactured home and land.**

NAR agrees that it is appropriate to exempt loans that are secured by a residential structure only, such as a manufactured home. Pricing and financing of such homes is accomplished on a very different basis than stick-built residential housing. The objectives of the agencies will not be served and the consumer will not be protected without a USPAP-compliant real property appraisal with interior inspection for mortgage loans that are secured by both a manufactured home and land. Simply adding the manufacturer's invoice price to the value of the site or lot does not provide the agencies or the consumer a credible indication of the value of the two combined. The value of the two combined could be affected by off-site influences and economic conditions. A basic tenet of value is "cost does not create value". This is consistent with federal government and government-sponsored enterprise (GSE) manufactured home loan programs that require USPAP-compliant real property appraisals.

**Question 28: The Agencies invite further comment on these and related concerns (relating to valuation requirements for streamlined refinance programs), and appropriate means of addressing these concerns as part of this rulemaking.**

NAR strongly supports increasing refinancing opportunities to many underwater borrowers. Helping consumers refinance to less expensive or more stable loans will alleviate existing housing cost pressures and stimulate the economy. Adding an appraisal requirement will increase the cost and time for borrowers and lenders, especially in rural areas. Taxpayers are already on the hook for these loans and will benefit from providing the borrowers with an easier path to refinancing.

NAR appreciates the opportunity to comment on this supplemental proposal. If you have any questions regarding this letter, please contact me or our Associate Regulatory Policy Representative, Sarah Young, at 202-383-1233 or [scyong@realtors.org](mailto:scyong@realtors.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Thomas", written in a cursive style.

Gary Thomas  
2013 President, National Association of REALTORS®