



January 20, 2009

Mary F. Rupp, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

VIA ELECTRONIC MAIL

RE: *Proposed Interagency Appraisal and Examination Guidelines*

To whom it may concern:

MDA Lending Solutions would like to thank the Agencies for the opportunity to comment on the Proposed Interagency Appraisal and Evaluation Guidelines. As a national provider of settlement services to mortgage and equity lenders, we provide products, services and solutions that drive time, cost and risk out of the estate transactions. We believe the proposed guidelines will enhance and strengthen the risk management practices of federally chartered institutions, and we support these efforts to promote transparency and independence in the property valuation process.

Formerly known as TransUnion Real Estate Services, MDA Lending Solutions is a founding and sustaining member of the Collateral Assessment Technology Committee (CATC) of the Real Estate Information Professionals Association. CATC was founded by AVM providers with a charter to promote the education and awareness of alternative collateral assessment tools and technologies. CATC places a premium, above all others, on the transparent and objective evaluation, implementation and application of these tools.

On behalf of its members, CATC has submitted a letter to the Agencies commenting on the Proposed Guidelines. This CATC letter seeks to clarify and strengthen specific sections of the Proposed Guidelines, primarily as they relate to AVMs. MDA Lending Solutions supports the response from CATC and asks the Agencies to consider these comments as they finalize this new regulatory guidance for valuations. For your convenience a copy of this letter is attached.

Again, thank you for the opportunity to comment.

Sincerely,

Greg Dennis
VP, Collateral Valuations