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Appraisal Subcommittee

Federal Financial Institutions Examination Council

October 19, 2006

AQB Comments
The Appraisal Foundation
1155 15th Street, NW
Suite 1111
Washington, DC 20005

Dear AQB:

Thank you for the opportunity to comment on the Appraiser Qualifications Board's ("AQB") August 29, 2006 "Exposure Draft on revisions to the 2008 *Real Property Appraiser Qualification Criteria*, as well as Interpretations and Guide Notes applying to the *Real Property Appraiser Qualification Criteria*." Please note that these comments are ASC staff comments that have not been formally reviewed or approved by the ASC.

- **Proposed Revisions to the *Real Property Appraiser Qualification Criteria* (effective January 1, 2008)**

We concur with the proposed changes to the 2008 AQB Criteria. We suggest the following actions for clarity and/or consistency:

- III. E. 3. – We suggest that the word "any" be changed to "each" so that the phrase reads, "there must be appropriate testing of each module included in a course."
- III. E. 6. – We suggest that the word "testing" in the last sentence be changed to "examination."
- III. F. 4. – The two sentences added to the end of this provision appear unnecessary. The two sentences provide that continuing education credit can be awarded to education instructors, with certain limitations. That authority, with the same limitations, is provided in the already existing portion of this provision.
- Collegiate subject matter courses – While we agree with the proposed deletion of the words "Introduction to" that precede "Computers – Word processing /spreadsheets," we question whether this change is adequate. Basic computer word processing and spreadsheet skills now are taught in elementary or middle school. While some college students might need such basic computer education, most move directly into more advanced courses. You might consider adding wording similar to that used in "Algebra, Geometry, or higher mathematics" that would allow more advanced computer classes.

- **Interpretation – Continuing Education Credit for Attendance at State Appraisal Regulatory Agency Meetings**

In our April 17, 2006 letter commenting on your March 22, 2006 exposure draft, we concurred with the AQB's proposal to allow continuing education credit for State appraiser regulatory agency meetings, under certain circumstances. In the current exposure draft, you propose prohibiting credit for all regular State agency meetings. There are pros and cons to both sides of this issue. As noted in our April 17th comments, some State meetings could meet the definition for continuing education, while many would not. We understand the AQB's concerns and do not disagree with this proposal.

- **Interpretation – Existing Credential Holders**

This interpretation does not appear to state anything that is not already stated in Section II - Existing Credential Holders.

- **Interpretation – Changing a Credential**

We concur with the proposal.

- **Guide Note 4**

We concur with the proposal. The last sentence in the Guide Note appears to be redundant given item 2. h.

Thank you again for the opportunity to comment. Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director