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Appraisal Subcommittee
Federal Financial Institutions Examination Council

November 16, 2009

Donald Rodgers, Executive Director
North Carolina Appraisal Board
5830 Six Forks Road
Raleigh, NC 27609



Dear Mr. Rodgers:

Thank you for providing your draft November 2, 2009 Notice of Intent to amend specified sections of the North Carolina Administrative Code. Following are comments regarding the draft regulations:

- The proposal corrects §§57a.0204j and 57A.0206e by allowing individuals returning from active military duty to renew their credential providing they demonstrate the requisite continuing education within 90 days (rather than 180). This proposed change reflects amendments we suggested in our September 15, 2008 Compliance Review letter. We support prompt adoption.
- The proposal also addresses inconsistencies with the AQB criteria noted during the Review by: (1) limiting the amount of continuing education allowed for educational activities (such as teaching appraisal courses) to no more than 14 hours per two-year continuing education cycle; and (2) requiring online education to have IDECC approval, as well as approval by the AQB's Course Approval Program (CAP). This proposed change reflects amendments we suggested in our September 15, 2008 Compliance Review letter. We support prompt adoption.
- In accordance with §57B.0306(a)(3), if a USPAP instructor either fails to renew or loses his/her Appraiser Qualifications Board certification, he/she must immediately stop teaching. This is also the consequence if the instructor fails to renew or loses his/her state certification.
- §57B.0611(a) should be revised. Courses that are CAP approved will expire on the subsequent December 31, or the date specified, whichever occurs first.

Please contact us if you have any questions.

Sincerely,

James R. Park
Executive Director