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Appraisal Subcommittee
Federal Financial Institutions Examination Council

VIA FACSIMILE

September 22, 2006

Jun Maiquis, Regulations Specialist
Division of Occupational Licensing
Department of Commerce, Community and Economic Development
P.O. Box 110806
Juneau, AK 99811-0806

Dear Ms. Maiquis:

Thank you for sending us your August 2006 Notice of Proposed Changes to Title 12 of the Alaska Administrative Code. The proposed changes incorporate education, experience and examination requirements for certification based on the Appraiser Qualifications Board's ("AQB") Real Property Appraiser Qualifications Criteria effective January 1, 2008. In general, we support your prompt adoption of the proposals.

One modification to the proposals, however, is necessary to ensure that the 2008 criteria are reflected accurately in your regulations. Whenever the proposals refer to the 15-hour National USPAP course and state that at least one of the course instructors must be an AQB certified USPAP instructor, please add language stating that instructor also must be a State certified appraiser.

Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director