

Robert K. Rickman, MAI
5020 Campus Drive
Newport Beach, California 92660
(949) 752-0583

Via Telefax to (202) 293-6251

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Mr. Marc L. Weinberg
General Counsel
Appraisal Subcommittee
2000 K Street N.W.
Suite 310
Washington, D.C. 20006

Dear Mr. Weinberg:

I reviewed the Policies of the Appraisal Subcommittee published on your Internet site. The following are direct quotations from Policy 5:

"Title XI requires a State agency to recognize on a temporary basis the certification or license of an appraiser from another State provided: (1) the property to be appraised is part of a federally related transaction; (2) the appraiser's business is of a temporary nature; and (3) the appraiser registers with the State appraiser regulatory agency in the State of temporary practice."

"Thus, a certified or licensed appraiser from State A, who has an assignment concerning a federally related transaction in State B, has a statutory right to enter State B, register with the State agency in State B and perform the assignment."

Given this policy statement, it is not clear to me how states are allowed to deny or delay a Temporary Practice Permit (TPR) request submitted by a licensed or certified appraiser from another state.

Would you please provide the legal authority that allows states to deny a TPR request? In addition, if there is such an authority, would you please advise under what circumstances a state may deny or delay a TPR?

Thank you for your assistance,


Robert K. Rickman, MAI