

CLARK REALTY SERVICES
Real Estate Appraisers

September 14, 1999

Appraisal Subcommittee
FFIEC
2100 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20037

Re: FHA Mortgage Letter 99-29, 9-10-99


It appears that FHA/HUD believes it does not have to comply with the Federal Law known as FIRREA, and can require appraisers to violate state law(s).

This places the appraiser in a terrible position.

Please, can this issue be addressed before appraisers start to lose their state license.

By the way, since when has a federal agency been allowed to violate

Respectfully,


Charles D. Clark
State Certified Residential Appraiser
Certified Instructor in over 30 states

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