Appraisal Subcommittee

Federal Financial Institutions Examination Council

By FAX March 10, 2003

Charles Clark, Real Estate Commissioner Georgia Real Estate Appraisers Board Suite 1000, International Plaza 229 Peachtree Street, N.E. Atlanta, GA 30303-1605

Dear Mr. Clark:

Thank you for providing us a copy of your proposed regulatory amendments requiring Georgia Licensed and Certified appraisers to complete successfully a Uniform Standards of Professional Appraisal Practice ("USPAP") course of at least seven hours every two consecutive renewal periods. The Appraiser Qualifications Board's ("AQB") qualification criteria for State certified appraisers require that this USPAP course must be the National USPAP Course or its equivalent. Equivalency is determined through the AQB Course Approval Program or by an alternate method established by the AQB. Under Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended, this requirement needs to be incorporated into State law. Therefore, please amend your proposed regulation to conform to this requirement.

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

Sincerely,

Ben Henson Executive Director