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Appraisal Subcommittee

Federal Financial Institutions Examination Council

VIA FACSIMILE

July 28, 2006

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

Dear Mr. Clark:

Thank you for providing us a copy of the June 23, 2006 Notice of Intent to amend §§ 539-1-.01A, 539-1-.02, 539-1-.03, 539-1-.04, 539-1-.05, and 539-1-.06 of the Georgia Real Estate Appraisers Board's rules. We have reviewed the proposed rules and offer one comment.

Section 539-1-.05(11) would require non-resident candidates for classification to produce from the licensing body of each state which has licensed the individual a certification (e.g., letter of good standing) issued no more than 12 months prior to making application in Georgia. The certification would have to show that the candidate:

1. has passed an examination for the type of classification for which such candidate for classification seeks classification in Georgia;
2. has met all preclassification and continuing education requirements required by such other state(s) for that classification;
3. is classified in good standing at the time of the certification; and
4. has not had any formal disciplinary action imposed by such state's licensing body.

We believe that the ASC Web site's License History Report function provides the information requested in the proposed provisions, provides the information much more quickly than the method proposed; and is more reliable. Therefore, we encourage you to consider relying on the License History Report function rather than the proposed certification approach.

Of particular concern is the provision that Georgia would accept a certification (e.g., letter of good standing) "issued no more than twelve months prior" to the candidate making application to Georgia. It is possible that an appraiser could have a certification that meets this requirement but also have a disciplinary action that occurred after the certification was issued. It appears that the proposed wording of your rule change would allow issuance of an appraiser credential based on potentially outdated information.

We also believe that the ASC's License History Report is more reliable than asking an individual to voluntarily submit a certification from each State in which he/she has ever held an appraiser credential. If an appraiser had been credentialed in multiple States and disciplined in only one State, it would be easy for that appraiser to submit certifications from each of the States in which he/she has not been disciplined, and omit the certification from the State that had taken disciplinary action. Based on the proposed certification approach, it does not appear that Georgia

would have any method of knowing that this omission occurred. Use of the License History Report would prevent such omissions.

Again, thank you for the opportunity to comment on Georgia's proposed rule changes.

Sincerely,

Ben Henson
Executive Director