ATLANTIC APPRAISAL SERVICES, INC.

1331 Ocean Blvd., Suite 102 • St. Simons Island, Georgia 31522 912-638-2687 • Fax: 912-638-7713 • E-Mail: savoyie@mindspring.com



August 11, 2004

Ms. Virginia Gibbs Chairperson Appraisal Subcommittee 20th and "C" Streets. N.W. !ashington, D. C. 20551

Dear Madam Chairperson Gibbs:



I realize your very *awkward* position being the Chair of the Appraisal Subcommittee However, you have come to the position with very high recommendations and I'm sure you will do a. great job.

Ms. Gibbs, I served on the first Georgia Real Estate Appraisers Board May 1990 - December 1993. The first year :.alt` 1 served as vice ice chair and last two years as chairman. ! was ire-appointed December r 1999 to the Board where I currently serve as vice chairman. I also was one of the founding directors for the Association of Appraisal regulatory Officials (AARO).

During these years of participation in these areas, the Appraisal Foundation's activities in the Qualifications of Real Estate Appraisers has been a very sore topic with many state regulators, appraisal schools and appraisers. Cinder Title 11, section 1116 Certification and licensing requirements:

- (a) The states s were to use minimum criteria that *currently* met the Appraiser Qualification Boards criteria. Nowhere in Title 11, does it authorize any further activity in the education criteria.
- (b) Restriction. As used in this section, the term "State Licensed Appraiser" under this section unless such individual has achieved a passing grade upon a suitable examination administered by a State or Territory that is consistent with and equivalent to the Uniform State Examination issued or endorsed by the Appraiser Qualification Board of the Appraisal Foundation.

Where does the Foundation, as described in Section 1121 Definitions as being a not f profit corporation under the laws of Illinois, have the authority to approve courses, instructors and tests that states have provided with success? I have read your LAG'S letter several times and feel he may need a lesson in the English Language, and should

have read Title 11! Please don't forget the US Constitution, which does not permit a Private Corporation such as the Appraisal Foundation to over rule any state.

I have included a copy of Title 11, and several of the releases from The Appraisal Foundation. Which should save you time of looking up.

I shall look forward to a timely response. I'm sure you will perform in an excellent manner at the Appraisal Subcommittee and do a great job.

Charles fredom

Charles S. Wood