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Appraisal Subcommittee

Federal Financial Institutions Examination Council

March 30, 2005

Mr. Stephen G. Patten
Lee & Grant Company
4333 Dunwoody Park, Suite 1412
Atlanta, GA 30338

Dear Mr. Patten:

This letter responds to your February 12, 2005 letter to me as Chairman of the Appraisal Subcommittee ("ASC") and your February 15, 2005 letter to Steven D. Fritts, an ASC Member, regarding the ASC's oversight of the Appraisal Foundation and the activities of the Foundation's two boards, the Appraiser Qualifications Board and the Appraisal Standards Board. These letters are the latest in a series of correspondence on this subject that dates back to October 2000.

You contend that we have not addressed the issues discussed in your July 28, 2004 letter, as well as the June 27, 2002 letter from Mr. Blackburn, the executive director of the Kentucky Real Estate Appraisers Board. In our view, our letters of November 10 and December 30, 2004, responded fully to the concerns raised in your July 28, 2004 letter. Moreover, we have responded to Mr. Blackburn's letter and have enclosed our July 19, 2002 response letter.

As I stated in my most recent letter to you, the Subcommittee is willing to enter into a dialogue with you about the mechanism for accomplishing the goals set by Congress in Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act. This would be a more fruitful endeavor than revisiting your arguments about the congressional intent behind Title XI, as we are not in agreement about the authority and responsibilities granted by Congress to the Appraisal Foundation. As noted in our previous correspondence, if you wish to discuss new substantive issues or concerns, the Subcommittee is available to meet with you.

Sincerely,

Virginia M. Gibbs
Chairman

Enclosure