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Appraisal Subcommittee

Federal Financial Institutions Examination Council

October 25, 2004

Ms. Jeannine Benedict
Bureau of Commercial Services
Department of Labor and Economic Growth
P.O. Box 30018
Lansing, MI 48909-7518

Dear Ms. Benedict:

Thank you for the opportunity to review the proposed changes to Article 26 §339.23101 and §339.23309 of the Administrative Rules for Real Estate Appraisers. The Notice of Public Hearing proposes the adoption of the 2005 edition of the Uniform Standards of Professional Appraisal Practice, which becomes effective on January 1, 2005. The Notice also revises the distance education course criteria to conform to that prescribed by the Appraiser Qualifications Board as we suggested in our August 17, 2004 field review letter. We, therefore, strongly support their adoption.

Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director