Appraisal Subcommittee

Federal Financial Institutions Examination Council

January 5, 2007

Dr. James S. Hsu, Executive Director Board of Real Estate Appraisers Division of Consumer Affairs P.O. Box 45032 124 Halsey Street Newark, NJ 07101

Dear Dr. Hsu:

Thank you for providing us a copy of your December 8, 2006 Notice of Proposal. We have reviewed the proposed rule amendments in that Notice and have no comments. However, because the proposals would allow applicants to take appraisal examinations prior to earning all of their experience, please keep in mind that the Appraiser Qualifications Board criteria states that applicants have a reasonable period of time (up to 24 months after state approval) to take the examination, and that examination results are valid for no more than 24 months.

Please contact us if you have any questions.

Sincerely,

Ben Henson Executive Director