

812 SW Washington Street, Suite
850 Portland, Oregon 97205
September 25, 2000

Mr. Ben Henson, Executive
Director
Appraisal Subcommittee
2000 K Street NW
Washington DC 20006

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Dear Mr. Henson:

I am a certified real estate appraiser in the state of Oregon. Enclosed is a copy of a legislative concept that changes Oregon's ACLB from policy making to advisory and moves the program to the Division of Finance and Corporate Securities within the Department of Consumer & Business Services. The Division of Finance and Corporate Securities regulates Oregon's state-chartered financial institutions, including banks, trusts, and credit unions, consumer finance companies, mortgage bankers and brokers, and credit service organizations.

Apparently the ACLB in Oregon has already been moved to the Division of Finance and Corporate Securities. The new ACLB administrator is H. James Krueger, who is also the Division of Finance and Corporate Securities mortgage lender program manager.

In 1993 (letter enclosed), then ASC Executive Director Edwin W. Baker commented on a similar proposal Oregon. Appraisers in Oregon are also "concerned that an (advisory) board will not have a truly meaningful opportunity to participate in all aspects of the State's appraiser regulatory scheme".

Further, Baker's letter noted "that States should adopt and maintain an organizational structure for appraiser licensing, certification and supervision functions in a manner to avoid conflicts of interest or the appearance of such conflicts" (with Title XI of FIRREA).

I ask you to please review the enclosed materials and comment on this proposed legislative concept.

Your timely response is requested, as public disclosure of this legislative concept was not provided until after it was submitted to the Governor's office.

Sincerely yours,



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enclosure