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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

June 19, 2006

Steven Wennberg, Counsel  
State Board of Certified Real Estate Appraisers  
Post Office Box 2649  
Harrisburg, PA 17105-2649.

Dear Mr. Wennberg:

Thank you for the opportunity to review the proposed amendments to the State Board of Certified Real Estate Appraisers' regulations. We understand that these proposals, in large part, are intended to implement the Appraiser Qualifications Board's ("AQB") January 1, 2008 criteria and to address our findings in our May 21, 2003 field review letter and ASC staff comments during our field review earlier this month. In general, while we support the very prompt adoption of these rule proposals, we would appreciate your changing the proposals in the following ways:

- §§ 36.11(c)(2) and 36.12(c)(2) - Please remove the phrase, "A teacher requesting credit for the classroom hour may not request credit for experience." Retaining that language in the proposal might be confusing because the rest of that paragraph, which addresses awarding experience credit for teaching appraisal courses, has been deleted to conform to AQB criteria;
- §§ 36.11(2)(e)(2) and 36.12(2)(e)(2) - Please revise to reflect that all appraisal experience must be obtained after January 30, 1989, and must be USPAP compliant; and
- § 36.91 – To conform to AQB criteria, please change to state that, prior to reactivation, inactive certified credential holders must complete all required continuing education hours that would have been required if the credential holder was in on active status. The required hours also must include the most recent edition of a 7-hour National USPAP Update Course.

Please contact us if you have any questions.

Sincerely,

Ben Henson  
Executive Director