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Appraisal Subcommittee

Federal Financial Institutions Examination Council

November 17, 2003

Mr. Terry R. Rudd
2901 Perry Lane
Clarkston, WA 99403

Dear Mr. Rudd:

Thank you for your September 26, 2003 letter that we received on October 20th expressing your concerns about the State of Washington Department of Licensing investigation of appraiser-related complaints. As part of our standard oversight activities, we perform on-site reviews of State appraiser regulatory agency activities on a cyclical basis. Complaint investigation and resolution is one of the primary areas we review. We will include the circumstances discussed in the attachments to your letter during our next regularly scheduled field review of Washington.

Regarding your recommendation that the Appraisal Subcommittee require States to hire experienced appraisers with first hand real estate backgrounds to staff the various departments, such an action would not be within our authority. State governments are sovereign entities. In general, our oversight authority involves a State's overall compliance with Federal law rather than dictating the specific means a State uses to accomplish that compliance.

Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director