

□ □ □ □ □ □

Appraisal Subcommittee

Federal Financial Institutions Examination Council

October 24, 2005

Sherry Bren, Executive Director
Appraiser Certification Program
Department of Revenue & Regulation
445 E. Capitol Avenue
Pierre, South Dakota 57501-3185

Dear Ms. Bren:

Thank you for providing us with a copy of *Form 6, Notice of Public Hearing to Adopt Rules* in connection with a hearing scheduled for November 18, 2005. As you may recall, in February of this year, we provided comments via email to you regarding these proposed rules.

In a note attached to this notice, you asked at what time does creditable experience begin to accrue under the Appraiser Qualifications Board's ("AQB") real estate appraiser criteria. Experience begins to accrue when the appraiser applicant actually begins work on his or her first appraisal that includes experience hours that will be countable toward the AQB's experience criteria. It does not begin when the applicant begins employment for an appraisal firm or when, for example, an apprentice is issued his or her credential.

Please contact us if you have further questions.

Sincerely,

Ben Henson
Executive Director