



# STATE OF IDAHO

BUREAU OF OCCUPATIONAL LICENSES

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May 23, 2008

Ms. Jenny Tidwell  
Policy Manager  
Appraisal Subcommittee  
Federal Financial Institutions Examination Council  
2000 K Street N.W., Ste 310

Re: Idaho Real Estate Appraiser Board

Dear Ms. Tidwell:

Our Board requests the ASC to define "**Transaction Value**," particularly in its relationship to the various levels of licensure defined by terms such as "Licensed Residential," and "Certified Residential." The 2008-2009 Edition of USPAP does not define the term "Transaction Value."

How does the term "**Transaction Value**" compare and contrast with the term "**Market Value**" as defined by the USPAP, FNMA, FHLMC, and others. Specifically, does the term "Transaction Value" relate to the **loan amount** in a given lending transaction governed by the FIRREA, rather than the "Market Value" of the **real property** (the estimated value to be developed by the appraiser)?

If so, in a sale financed by a loan governed by FIRREA, does the:

- "Transaction Value" of the loan sought by the borrower, or
- the developed "Market Value" of the real property considered as collateral to the loan

provide the proper basis of an appraiser's decision to deliver an appraisal within any stated "value" limitation of a given State's levels of Residential Licensure/Certification.

We are aware that the loan amount may be stated as a finite amount, or as a percentage of the Market Value of the real property collateralizing the loan (i.e. 80% Loan to Value).

Sincerely,

Ken Nuhn  
Board Member

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Enclosures