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April 26, 2004

**CERTIFIED MAIL**

Mr. Steven D. Fritts, Chairman  
Appraisal Subcommittee  
2000 K Street, NW, Suite 310  
Washington, D.C. 20006

***RE: Response to March 29, 2004 Correspondence***

Dear Mr. Fritts:

As counsel for the State of Tennessee Real Estate Appraiser Commission, I am writing on behalf of the Chairman Pipkin and in response to your March 29, 2004 correspondence regarding the subcommittee's field review. You indicated in this correspondence that you were not directing our office to violate any due process procedural requirements and that you were requiring us to have the six (6) certified appraisers retake the certification examination and then downgrade them if they failed the examination. However, it still troubles us that the six (6) appraisers are being required to retake an examination that they originally passed and that they might have their license restricted by means of a downgrade if they fail to re-take and pass the examination within a certain timeframe. Since the act of re-taking the examination could result in a downgrade of an appraiser's license, we still contend that it does deprive these appraisers of their due process protections and that it is inconsistent with Commission's purpose and duties. Nevertheless, despite our reservations, we will abide by the subcommittee's directives.

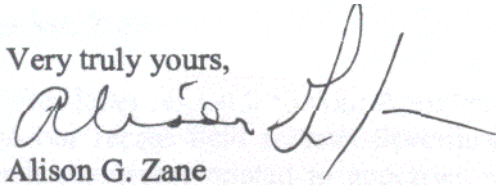
The other purpose of my letter is to request some clarification of the Appraiser Qualification Board criteria for examinations, in an effort to prevent any future misinterpretations. *The Real Property Appraiser Qualification Criteria and Interpretations of the Criteria* adopted February 16, 1994 and effective January 1, 1998, it states in the interpretation section that "Applicants have a reasonable period of time (up to 24 months after state approval) to take the examination. Successful completion of the

Pipkin to Fritts  
Response to AQB Subcommittee Findings  
March 31, 2004  
Page 2

examination is valid for a period of 24 months." (adopted July, 2000). Our Commission Staffs interpretation of this is that an applicant has up to twenty-four (24) months in which to take the certification examination after the state approves the applicant's education. An applicant then has *another twenty-four* (24) months in which to complete his or her experience requirement from the date that he or she successfully completes the examination. Please advise if this interpretation is correct.

We look forward to your response and thank you for your attentions and courtesies in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alison G. Zane", with a long horizontal flourish extending to the right.

Alison G. Zane  
Staff Attorney

CC: Sandy Moore, Administrative Director of the Tennessee Real Estate Appraiser  
Commission  
Lewis S. Pipkin, Chairman of the Tennessee Real Estate Appraiser Commission