

Appraisal Subcommittee

Federal Financial Institutions Examination Council

By Fax

August 28, 1998

The Appraisal Standards Board The Appraisal Foundation 1029 !ermont Avenue, NW, Suite 900 Washington, DC 2005-3517

Subject: June 23, 1998 Second Exposure Draft of Proposed Revisions to the Uniform Standards of Professional Appraisal Practice

Dear Sir or Madam:

Thank you for the opportunity to comment on your June 23, 1998 Second Exposure Draft of Proposed Revisions to the Uniform Standards of Professional Appraisal Practice ("Exposure Draft"). We congratulate the Appraisal Standards Board ("ASB") for its efforts to improve the Uniform Standards of Professional Appraisal Practice ("USPAP") and acknowledge the difficulty of this task in terms of different interests and constituencies. While we do not comment on specific details of the Exposure Draft, the Appraisal Subcommittee staff is pleased with the general direction of the Exposure Draft and the fact that the Exposure Draft fits within the familiar format of the 1998 USPAP. We believe that this approach increases USPAP's understandability and enforceability.

Sincerely,

Ben Henson Executive Director