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# Appraisal Subcommittee

*Federal Financial Institutions Examination Council*

January 6, 1999

Catherine Reardon, Director  
Department of Commerce and  
Economic Development  
Division of Occupational Licensing  
P.O. Box 110806  
Juneau, AK 99811-0806

Dear Ms. Reardon:

Thank you for your November 25, 1998 letter responding to our September 14, 1998 field review letter. We appreciate your efforts to address the issues raised in our letter. One issue regarding your "courtesy license," *i.e.*, temporary practice, remains.

At its November 5, 1998 meeting, the Board of Real Estate Appraisers ("Board") proposed revising 12 AAC 70.920(c). While the proposed revision changes the temporary practice period from 90 days to 180 days and provides for an extension, it continues to limit an individual to only one courtesy license in a calendar year. ASC Policy Statement 5 identifies as burdensome, therefore unacceptable, restricting an appraiser to only one temporary practice permit per year. Your proposed amendment needs to be changed to allow for more than one temporary practice permit per year. Finally, we appreciate the Board's willingness to discuss the definition of "appraisal assignment" in connection with temporary practice at its March 1999 meeting.

Please send us a written status report regarding these items after your March 1999 meeting. For your information, we have enclosed a copy of ASC Policy Statement 5: Temporary Practice. Please contact us if you have any questions.

Sincerely,

Ben Henson  
Executive Director

Enclosure