



November 15, 2001

Mr. Thomas Watson, Jr.
Chairman
Appraisal Subcommittee
2000 "K" Street, Suite 310
Washington, DC 20006

Dear Mr. Watson:

At their November 7, 2001 teleconference meeting, the Board of Certified Real Estate Appraisers reviewed your letter dated September 14, 2001, regarding your findings and recommendations from the audit that was conducted in August 6-8, 2001.

The board discussed the various issues that you address in the letter and will respond to each of those areas in this letter.

Alaska's Courtesy License regulations and procedures do not comply with Title XI and ASC Policy Statement 5

Definition of Assignment

In your report, you address the concern that the Alaska Board only allows one appraisal assignment per courtesy license - that is one property or building appraised, not considering that the contract may have more than one appraisal. As noted, 12 AAC 70.920(c) states that a courtesy license is valid for one appraisal assignment. The board agrees that "one appraisal assignment" would include more than one property. The board felt that AS 08.87.900(3) is clear enough that they would not need a regulation defining "one appraisal assignment". However, the board has requested that on the Courtesy License Application, that it clearly states that "one appraisal assignment" could include one or more properties.

Limiting appraisers to one courtesy license per calendar year

You have advised the board that limiting one courtesy license per calendar year is considered a burdensome requirement and requests that the board amend its regulations so that appraisers are not restricted to a single courtesy license per year.

Therefore, the board has taken action and requested an amendment to 12 AAC 70.920(c) to change the one courtesy license per year to two in a calendar year. As you are aware the courtesy licenses are good for 180 days. Once the regulation becomes effective, a person could obtain two courtesy licenses in one year.

Fee Requirements

The Board has been advised that the \$250.00 courtesy license fee is excessive and burdensome in accordance with the Title XI and ASC Policy Statement 5. Therefore, the board has taken action and requested an amendment to 12 AAC 02.370(6) to decrease the fee to \$150.00 for a courtesy license.

Alaska's affidavit validation process for certified residential applicant work experience is not meaningful

The board reviewed the concerns addressed, and the request that the Board require experience logs from certified residential real estate applicants, just as it does for certified general real estate applicants.

The board discussed this issue and recommended an amendment to 12 AAC 70.110(a) and (e) to require residential real estate appraisers to submit a log with their applications. The General Real Estate Appraisers will continue to be required to submit the log.

The board discussed your concerns regarding the persons who submit verifications and the verification form itself. The board will continue to require the work experience forms as required under 12 AAC 70.110(b). It was noted that if the board did not take action on requiring a log for residential real estate appraisers, then the direction was to develop a more meaningful experience affidavit. At this time the board has decided that with requiring the log, they will not change the requirements for the verification from the various individuals. The board will, however, be looking into changing the format of the verification form.

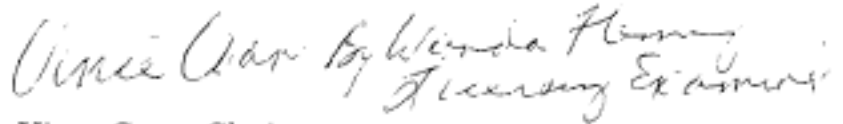
Alaska's initial licensing cycle could exceed two years, thereby requiring that the State collect and remit \$75.00 in National Registry fees to ASC

The board reviewed your concerns with the collection of the \$25.00 per year National Registry Fee. The Division will revise its procedures to ensure that appraisers who receive licenses valid for 25-27 months pay the \$75 National Registry fees.

Thank you for advising the board and Division staff on the use of the ASC License History Report for processing applications from out-of-state appraisers, which is featured on the ASC web site. As you indicated this provides comprehensive information about appraisers much faster than waiting for letters of good standing,

The board would like to take this opportunity to thank you for your participation in the Board's regulatory process. If you have any questions regarding this letter, please contact myself at (907) 373-6426 or the Licensing Examiner Wanda Fleming at (907)

Sincerely,

A handwritten signature in dark ink, appearing to read "Vince Coan By Wanda Fleming Licensing Examiner". The signature is written in a cursive, flowing style.

Vince Coan, Chairman
General Real Estate Appraiser
Board of Certified Real Estate Appraisers

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cc: Board Members
Catherine Reardon, Director