



ALABAMA REAL ESTATE APPRAISERS BOARD

P. O. Box 304355

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Don Siegelman
Governor

J. W. Holland, Jr.
Executive Director

March 9, 1999

MAR 15 1999

Mr. Herbert S. Yolles, Chairman
Appraisal Subcommittee/ FFIEC
2000 K Street, NW, Suite 310
Washington, DC 20006

Dear Mr. Yolles:

This is in response to your letter of January 15, 1999 which reported the results of the Appraisal Subcommittee (ASC) review of our Board on December 9-10, 1998.

The review revealed that in most respects the Alabama program is efficient and well operated. Two areas were highlighted where attention was recommended as follows:

- **The Board must revise its regulations for Temporary Permits to comply with Title XI and ASC Policy Statement 5.**

We have promulgated changes to our Administrative Code effective March 10, 1999 which lengthen the period granted for Temporary Permits from 90 days to six months. In the interim we have extended the 90-day period to six months in every instance where a request for more time was received.


- **The Board needs to investigate and resolve complaints in a timely manner.**

As you recognized in the above referenced letter our disciplinary program is characterized by thorough, in-depth investigations with comprehensive reporting. This approach has proven to be successful overall. On occasion it has required Board members to devote an inordinate amount of their personal time to provide the necessary degree of technical oversight and guidance. Some protracted delays were inevitable based on logistical problems and scheduling coordination.

On October 1, 1998 for the first time since the inception of the Board we were able to hire a Certified Appraiser as a full time staff investigator. We hope to be adding a second Certified Appraiser in the same capacity soon. We have already seen a dramatic change occur in our complaint processing time because of the diminished need for hands on involvement by Board members at every stage. To improve the turn around time on complaints is one of our top priorities and we feel that progress is being made.

We appreciate the professional and objective manner in which the review was conducted and communicated to the Board, The Alabama Real Estate Appraisers Board looks forward to the continuance of a mutually beneficial working relationship with The Appraisal Subcommittee.

Sincerely,


Bobby Moorer
Chairman