

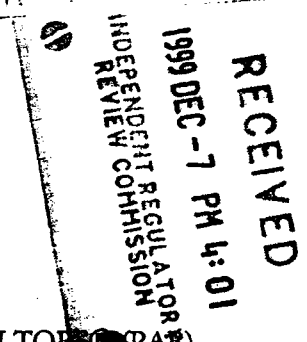
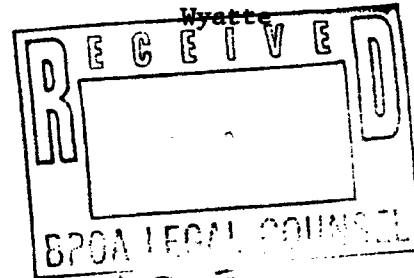


Pennsylvania Association of REALTORS®

The Voice for Real Estate® in Pennsylvania

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December 1, 1999

Mr. Steven Wennberg, Counsel
State Board of Certified Real Estate Appraisers
P.O. Box 2649
Harrisburg, PA 17105-2649

REGULATION 16A-7010

Dear Mr. Wennberg:

On behalf of the 26,000 members of the Pennsylvania Association of REALTORS® (PAAR), we would like to thank you for the opportunity to comment on proposed regulations in the November 6, 1999 issue of *The Pennsylvania REALTOR®*.

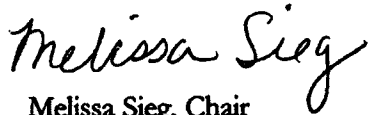
The proposed regulations concern federally related transactions under the Financial Institutions Reform, Recovery and Enforcement Act (FIRREA). The content and language of state regulations for residential and general certification, education and experience, mandatory course topics, appraisal experience and special rules are derived, almost verbatim, from the Appraisal Qualifications Board (AQB) qualifications criteria and interpretations. In 1994, the AQB increased various standards and requirements. Sections 36.11 and 36.12 of Pennsylvania's Real Estate Appraisers Certification Act have not been updated to reflect the revised federal standards. This regulatory package will accomplish that task.

- Section 36.11 – This proposed amendment would delete references to outdated education requirements and adopt the National USPAP course as part of the current education requirement, revise mandatory course topics to include subtopics, reflect current experience requirements and make editorial changes. This proposed amendment would also reflect the fact that residential appraisers are now authorized to perform residential appraisals in non-federally related transactions as well.
- Section 36.12 – This proposed amendment would reflect current education requirements, mandatory course topics, current experience requirements and make editorial changes. This proposed amendment would also clarify that a general appraiser is authorized to perform appraisals in non-federally related transactions as well as federally related transactions without regard to value.



PAR supports this regulatory package which will bring Pennsylvania into compliance with federal standards and increase professionalism in the appraisal industry. We appreciate this opportunity to share our views with you on this matter. Please contact PAR's Department of Government Affairs if you have any questions.

Sincerely,



Melissa Sieg, Chair
License-Law Subcommittee



Derenda Updegrave, Director
Department of Government Affairs