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**Pennsylvania Association of
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November 7, 2000

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

RE: Proposed Regulation 16A-7011 (Fees for Board Services)

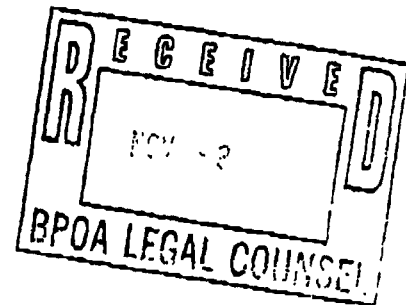
Dear Mr. Wennberg:

On behalf of the 26,000 members of the Pennsylvania Association of REALTORS (PAR), we thank you for the opportunity to comment on proposed regulation 16A-7011 (Fees for Board Services). PAR appreciates this opportunity to work with the Board on development of regulations impacting the appraisal and real estate industries in Pennsylvania.

Proposed regulation 16A-7011 would implement recommendations by the Revenue Office concerning user fees for Board services. These recommendations would increase fees in several areas to reflect the actual cost to the Board for providing such services. The Revenue Office has also recommended establishment of a new fee to defray the Board's costs of processing an application for approval as a continuing education provider.

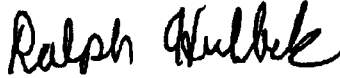
PAR does not dispute the findings of the recent system audit of Board operations that is the catalyst for this proposed fee increase. However, PAR is concerned that increased fees not become a barrier for entry into the appraisal profession. For example, the individual application for examination fee for Certified Real Estate Appraisers would be increased by 427 percent in the Board's proposal. This large an increase appears considerably high compared to professions such as real estate.

PAR is also concerned that additional revenues generated through this fee increase be used to provide services to licensees and not add further bureaucratic levels to Board operations. Does the Board have projected budgetary goals for the additional revenue?



Thank you again for the opportunity to comment on these proposed regulations. Please contact our Department of Government Affairs if you have any questions.

Sincerely,



Ralph Horlbeck, Chair
License Law Subcommittee



Derenda Updegrave, Director
Department of Government Affairs