

Pennsylvania Association ofREALTORS®

The Voice for Real Estate® in Pennsylvania

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October 28, 2002

Steven Wennberg, Counsel
State Board of Certified Real Estate Appraisers
PO Box 2649
Harrisburg, PA 17105-2649

Dear Mr. Wennberg:

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DOS LEGAL COUNSEI

On behalf of the 25,000 members of the Pennsylvania Association of REALTORS®, we welcome the opportunity to comment on the proposed Biennial Renewal Fees and Examination Fees regulation (16A-7013) published in the October 5, 2002 edition of *The Pennsylvania Bulletin*.

The proposed regulation would raise the biennial renewal fee for certified real estate appraisers and certified Pennsylvania evaluators from \$105 to \$225; establish a biennial renewal fee of \$225 for certified broker/appraisers; and delete the examination fees for certified real estate appraisers and certified Pennsylvania evaluators.

We understand that the Board has not raised its fees for certified real estate appraisers and certified Pennsylvania evaluators since 1992 and 1993, respectfully. While the Association does not object to the increase per se, it is unfortunate that there must be such a dramatic and substantial increase. Therefore, we respectfully suggest that the fees be increased during the next two renewal cycles, beginning July 1, 2003 and July 1, 2005, rather than in one increase.

The proposed regulation would also discontinue the practice of publishing updated schedules of examination fees. As the Board has no role in establishing or collecting examination fees, the Association has no objections as long as certificate holders are notified of the current examination fee and the information is published on the Board's website.

We appreciate the opportunity to share our views on this proposed regulation. Should you have any questions, please feel free to contact us.

Sincerely,

Legislative Committee

Derenda Updegrave, Director

Government Affairs