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INDEPENDENT REGULATORY  
REVIEW COMMISSION



Pennsylvania  
Association of  
REALTORS®

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in Pennsylvania*

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January 12, 2010

Judith Pachter Schulder, Counsel  
State Real Estate Commission  
PO Box 2649  
Harrisburg, PA 17105-2649

Dear Ms. Schulder:

As an organization that represents more than 30,000 of the Commonwealth's real estate licensees, the Pennsylvania Association of REALTORS® (PAR) welcomes the opportunity to provide input on the regulation titled "Fees" (16A-5615) as published in the December 19, 2009 edition of *The Pennsylvania Bulletin*.

The Commission currently offers a staggered rate for those applying for licensure during the biennial renewal cycle. The proposed regulation will revise the initial licensure fee structure from a two-tier system to a one-tier system in order for the Commission to accept on-line initial licensure applications.

PAR has discussed this regulatory revision and, taking into consideration that the Commission is not increasing licensing or renewal fees, we remain neutral on this concept.

We thank the Commission for providing PAR the opportunity to comment on this regulatory proposal. Please feel free to contact me should you have any questions.

Sincerely,  
**Derenda Updegrave**  
Director, Government Affairs

