



Pennsylvania Auctioneers Association



June 15, 2022

Jason McMurry
Board Counsel
P.O. Box 69523
Harrisburg PA 17106-9523

Dear Mr. McMurry:

Please accept this comment on behalf of the Pennsylvania Auctioneers Association with respect to the State Board of Auctioneer Examiners (Board) proposal to amend § 1.3 (relating to definitions) and add §§ 1.27 and 1.28 (relating to licensure by endorsement and provisional endorsement license).

As the Pennsylvania Auctioneers Association, we strive to provide support with to the State Board of Auctioneer Examiners and therefore want to provide our support regarding the Board's proposal to amend § 1.3 (relating to definitions) and add §§ 1.27 and 1.28 (relating to licensure by endorsement and provisional endorsement license).

Although, we do support this, we do want to provide commentary on the potential negative impact this proposal may have on judicial and administrative efficiency. Specifically, it is anticipated that this proposal may slow the auctioneer licensing process down in comparison to reciprocity, which is currently in place. The Board has done a phenomenal job duplicating the requirements already in existence under reciprocity.

Further, there does not appear to be a residency requirement and it is our understanding that the intent of this was to include a residency requirement. It is therefore our hope that the Board will consider adding a residency requirement.

All in all, we do support this proposal, but did want to ensure that the Board considers the impact this could have in that it may slow down the licensing process.

Thank you for this opportunity to provide commentary and please do not hesitate to let us know if there are any further questions.

Sincerely,
Jamie Shearer
2022 PAA President