



August 22, 2018

Honorable Steve Stivers  
Member of Congress; Ohio 15<sup>th</sup> District  
1022 Longworth HOB  
Washington, DC 20515

Dear Congressman Stivers:

We just received, and have now reviewed, a copy of your Discussion Draft titled '*To Establish a National Appraiser Licensing System and Registry for licensing and registration of real estate appraisers and appraisal management companies, and for other purposes*'. Let's start the discussion now.

First, the primary reason for the Draft may not exist. The Appraisal Subcommittee (ASC), a federally created body, has a website with the federally mandated and managed National Registry of Appraisers and the Registry of Appraisal Management Companies (AMC's). Registries offer background, data, and the means to locate Appraisers and participating AMC's

Second, the Draft lumps Appraisers and AMC's' together. In fact, each group has a specialized purpose; so, it seems disingenuous to comingle the groups. Typically, the result is confusion. Appraisers are professionally trained and licensed to estimate real estate value. The AMC function is unlicensed and administrative; applicable to some not all real estate transactions.

Lastly, what does '*and for other purposes*' invite. If this is a request for either or both groups to bring ideas or perceived needs to your attention, **CCAP**, a **NETWORK** participant (27 state appraiser groups which come together to discuss, better understand, and reflect on the issues of our profession) would be pleased start the ball rolling. We will contact our members and other **NETWORK** states inviting participation. We welcome the opportunity; please let us know.

Respectfully,

George St Johns, President  
**CCAP (California Coalition of Appraiser Professionals)**

CC: **CCAP** Board of Directors; Attachment: Discussion Draft '*To Establish a National Appraiser Licensing System and Registry for licensing and registration of real estate appraisers and appraisal management companies, and for other purposes*'

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