

A.C.O.W.
Appraisers' Coalition
of Washington

August 26, 2009

Mr. Ralph Birkedahl, Program Manager
Real Estate Appraiser Program
WA State Department of Licensing (DOL)
P.O. Box 9015
Olympia, WA 98507-9015

Re: Proposed Rule Making, WAC 308-125-120 Fees and Charges

Dear Mr. Birkedahl:

This letter represents the Appraisers' Coalition of Washington (ACOW) official response to the proposed increases to various appraiser fees, including those of for licensing, application, examination and reexamination, certification, reciprocity and the like.

While no one – including ACOW – directly welcomes or favors fee increases, ACOW recognizes that these increases are needed in order to continue to maintain the viability of the Real Estate Appraiser Program, and to ensure that the costs of administering the professional licensing program are covered. We do recognize and acknowledge that costs of the licensing program be borne by the members of the profession, and that it is essential the Program remain independent of any need to seek legislative support for ongoing funding from the State's General Fund.

We also note that this is the first fee increase since 2002, or for nearly the past eight (8) years, for most of the fees (excepting those for Trainee registration). While the increases proposed appear to be significant if viewed only in the context of a one year increase from 2009 to 2010, the increases are much less onerous when considering them as on an average annual increase basis over an eight year period. Further, the fees tend to fall within or at a level consistent with those assessed for other professions.

Thus, as it is necessary that the costs of the Real Estate Appraiser Program be borne by the members of the profession, and as it is critical that the Real Estate Appraiser Program remain viable, the Appraisers' Coalition of Washington (ACOW) does not oppose the proposed fee increases.

Sincerely,



Stan Sidor
ACOW President