



July 28, 2015

Mr. Michael Giannelli  
Chair  
Commonwealth of Massachusetts  
Board of Registration of Real Estate Appraisers  
1000 Washington Street  
Boston, MA 02118

Ms. Ann Barry  
Associate Executive Director  
Commonwealth of Massachusetts  
Board of Registration of Real Estate Appraisers  
1000 Washington Street  
Boston, MA 02118

RE: Review of Regulations

Dear Mike and Ann,

The MBREA | The Association for Valuation Professionals is appreciative of the time we were allotted at the recent listening session about appraiser regulations. We trust our comments were positively received and we look forward to continued dialogue with the Board.

We are offering alternative language for one of the recommendations made at the meeting by adding wording requiring complaints be filed by the intended user(s) of an appraisal. The revised recommendation reads as follows:

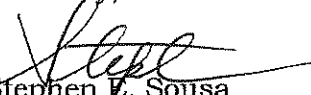
Add the following language to 1.04.1:

"The Board shall not take action on a complaint unless the complaint:

- a. is filed by the intended user(s) of the appraisal and,
- b. is filed with the Board within 5 years after the date the report's certification is signed or within 2 years after final disposition of any judicial proceeding in which the appraiser provided testimony related to the assignment, whichever period expires last."

We are available to meet with the Board and staff to discuss these and any other issues. The Board may wish to establish a working group with stakeholders as members to assist in revising the Regulations. If so, the MBREA would be happy to participate.

Sincerely,

  
Stephen E. Sousa  
Executive Vice President

