



NATIONAL ASSOCIATION OF REALTORS®

The Voice For Real Estate®

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April 6, 2010

Edward J. DeMarco
Acting Director
Federal Housing Finance Agency
Fourth Floor
1700 G Street, NW
Washington, DC 20552

Dear Director DeMarco:

I am writing on behalf of the 1.2 million members of the National Association of REALTORS® (NAR) to ask the Federal Housing Finance Agency (FHFA) to require that the government sponsored enterprises (GSEs), Fannie Mae and Freddie Mac, implement the Independent Valuation Protection Institute (IVPI). We believe IVPI is a critical component of the Home Valuation Code of Conduct (HVCC) and the delayed implementation is furthering the unintended consequences of HVCC.

The National Association of REALTORS® is America's largest trade association, including NAR's five commercial real estate institutes and its societies and councils. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,400 local associations or boards, and 54 state and territory associations of REALTORS®. NAR has approximately 30,000 appraiser members from across the country and approximately 750 have earned our Residential Accredited Appraiser (RAA) and General Accredited Appraiser (GAA) designations.

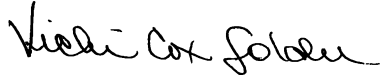
The Independent Valuation Protection Institute (IVPI) was announced as part of the HVCC to receive complaints from appraisers and users of appraisal services on the improper influence or attempted improper influence of appraisers. Under the HVCC, the lender is responsible for establishing a telephone hotline to receive complaints from appraisers, individuals, or any entity concerned with the improper influencing of appraisers or the appraisal process. Lenders report any improper activity to the IVPI and the state regulating agency. However, the IVPI was never implemented.

In 2009 Fannie Mae published the IVPI Interim Complaint Form. According to the Fannie Mae announcement, the form would be found on an interim IVPI complaint Web site until the IVPI could be fully implemented. The Web site was to be operational by November 2009. At the latest meeting of the Appraisal Foundation Advisory Committee (TAFAC) meeting in March, Fannie Mae stated that the IVPI Interim Complaint form had been withdrawn at the request of their regulator.

NAR calls on FHFA to implement the IVPI. The IVPI is an integral part of the HVCC which, if properly implemented, would have complemented already existing appraisal regulatory bodies at the state and federal levels. The IVPI should be implemented to fulfill the implementation of HVCC and to help address unintended consequences created by the Code. Further, the IVPI will be positioned to work with appraisal organizations and state regulatory agencies to ensure the independence of appraisers and the integrity of the appraisal process.

Thank you for your time and consideration of this matter. If you have any questions or concerns, or if I may be of service to you, please do not hesitate to contact me or our Senior Regulatory Policy Representative, Jerry Nagy, at 202.383.1233 or jnagy@realtors.org.

Sincerely,



Vicki Cox Golder, CRB
2010 President
National Association of REALTORS®

cc: Michael J. Williams
President and Chief Executive Officer
Fannie Mae

Charles E. Haldeman, Jr.
Chief Executive Officer
Freddie Mac

The Honorable David H. Stevens
Assistant Secretary for Housing – FHA Commissioner
US Housing and Urban Development

William Apgar
Senior Advisor for Mortgage Finance
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