

# GREAT REALTY ADVISORS

To the IVSC Standards Board:

Re: Structure and Scope of the IVS

September 30, 2014

Question #1: Agree with A.

Question #2: Agree with A. You are publishing a minimum set of standards, requirements that must be adhered with to be in compliance. You are not writing mini-informational textbooks with optional reading.

Question 3A: Yes.

Question 3B: No; Textbooks, electronic material via the Internet, discussions with experts are superior sources.

Question 3C: I do not believe that any part of the TIPs should be part of the minimum set of requirements that appraisers must follow. The IVSC Standards Board must not be setting best practice but rather establishing basic, core standards. Best practice is found elsewhere (textbooks, electronic material via the Internet, discussions with experts, courses, etc.).

Question 4: Yes it can offer additional guidance material but it needs to be appropriately identified as optional guidance and not as requirements – Otherwise the required material must be in the Standards.

Question 5: No comment.

Question 6: Suggest keeping it simple. Standards are all requirements. Optional Guidance is additional material to explain the application of the Standards. Delete all of the best practice material which is large in volume and useless to the non-experts in these areas and useless to the experts working in these areas in my humble opinion.

Question 7: Yes I strongly agree that IVSs are not intended to provide educational material – This must be acknowledged and the inappropriate material deleted.

Respectfully submitted,

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