

Mr
John Hockey
Partner
MEYLER DENTON HOCKEY
European Property Consultants
PO Box 1270
Compton Martin
GB - Bristol BS40 6WD

Name: Thomas-Andreas Ziesenitz
Phone: +49 (30) 81 92 - 1 73
Fax: +49 (30) 81 92 - 1 79

cc:

Mr
Wolfgang Kälberer
Association of German Pfandbrief Banks
Director Brussels Office
Avenue Michel Ange 13
B - 1000 Brussels

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European Valuation Standards 2008 (EVS)
Comments on draft exposure document

Dear Mr Hockey

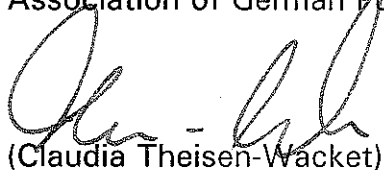
At the annual conference on 27 and 28 April 2007 in St. Petersburg, TEGoVA confirmed that the new edition of European Valuation Standards (EVS) should be prepared for publication in 2008. We refer to your request for comments on the draft version of 25 June 2007.

Basically we would like to mention that the EVS 1 "The Qualified Valuer", EVS 2 "Professional Ethics" and EVS 3 "Terms of Engagement" could be understood as a guidance, as well. For the purpose of better understanding we would furthermore appreciate to complete the EVS by a glossary containing the essential items.

Please find attached the comments of the Association of German Public Sector Banks to the draft exposure document EVS 2008.

Yours sincerely

Association of German Public Sector Banks



(Claudia Theisen-Wacket)



(Thomas-Andreas Ziesenitz)

attachment

European Valuation Standards (EVS) 2008
Comments on draft exposure document

Standard 3: Conditions of Engagement

- 3.02 Further points:
- It should be noted if the surveyor knows the projected selling price of the deal.
 - It should be noted if the valuation concerns an asset or a share-deal.
- 3.02 (ii) Does this remark refer to the valuation for project calculations in the future, as well?

Standard 4: Bases of Valuation

- 4.39 The phrase should be stated more precisely.
- 4.45 Beside the linear deduction method, are there any other methods possible, for instance progressive or declining balance methods?
- 4.79 The reference to EVS 7 is apparently not correct. We suggest it should be EVS 9.

Standard 6: Valuation Reporting

- 6.05 The following aspects should be mentioned as well:
- historic selling prices in the past,
 - the basis for Floor Areas - the surveyor should give reasons for his choice,
 - Calculation print-out.
- 6.27 What is the valuation practice in the UK? It is our understanding that there is both gross as well as net valuation (net valuation: exclusive stamp duty, agents and acquisition fees). With regard to the market value it should be pointed out whether a gross or net valuation is meant.

Standard 9: Valuation for Bank Security Purposes and in Relation to the Issue of Asset and/or Mortgage Backed Securities

- 9.16 We suggest concerning the mortgage lending value with regard to leaseholds to consider the following:
- It is our understanding that the loan of leaseholds should be paid back at a minimum of 10 years before the expiration of the leasehold.
 - The mortgage lending values must not include potential options of the borrower on any prolongations concerning the leasehold.