

LAW OFFICES OF AMY L. JARVIS

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Office of the Chief Counsel
Attn: Nancy M. Morris
Division of Market Regulation
Securities and Exchange Commission
100 F Street. NE
Washington, D.C. 20549-6628

Re: File No. S7-26-07

To Whom It May Concern:

I am writing to comment specifically on the question: "Are there educations and experience designations from groups other than those affiliated with NAR that would be appropriate to name specifically as evidencing "substantial experience in commercial real estate"?"

The CCIPS (Certified Commercial Investment Property Specialist) designation should be included in the exemption. A CCIPS designee completes the following course work approved by the California Department of Real Estate for continuing education credit:

- Selling Income Property Successfully
- Analysis of selling Income Property
- 1031 Tax Deferred Exchange
- Contracts and Negotiation for Investment/ Commercial Real Estate*
- Tax Aspects and Exit Strategies For Highly Appreciated Properties
- Group Ownership and Investment/ Commercial Real Estate
- Creative Solutions for Selling Investment Real Estate

Each course awards eight hours of DRE continuing education credit and the designee must pass a comprehensive exam for course credit. In addition a successful CCIPS designee will complete a series of projects designed to show competence in commercial real estate.

The SEC should also consider that most State real estate regulations permit paying a fee to agents referring their clients to other professionals with additional properties;

particularly when the other professional has expertise in locating commercial real estate. It is good public policy to increase investor choices.

In most cases, an investor is coming out of a 1031 exchange and has added pressure of completing the exchange under the 45 day identification period. It is poor public policy to arbitrarily force an investor to change his advisory team during this time period. The SEC should increase the amount of assistance and choice an investor has rather than limit it.

Thank you for the opportunity to comment and for your time in consideration of comments.

Respectfully submitted,

Amy L. Jarvis

*Contracts and Negotiation for Investment/ Commercial Real Estate is not currently approved by the DRE; approval pending in 2008.

For more information on CCIPS see www.ccips.net