From: Jim McCutcheon <jgmccut@charter.net> Sent: Monday, April 04, 2011 1:49 PM To: !FHFA REG-COMMENTS Subject: FHFA Proposed Rule on Certain Private Transfer Fee Covenants, (RIN) 2590-AA41

We feel the definition of "direct benefit" needs to be expanded so that a transfer fee assessed by a condominium association to the seller or buyer of a unit and used to recover the administrative costs to reproduce and provide the required disclosure materials would be included as a direct benefit.

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