

From: Jeff Goodwin <iteach@flash.net>
Sent: Monday, April 04, 2011 6:42 PM
To: !FHFA REG-COMMENTS
Subject: FHFA Proposed Rule on Certain Private Transfer Fee Covenants, (RIN) 2590-AA41

The Honorable Alfred M. Pollard
General Counsel
Federal Housing Finance Administration
1700 G Street, NW, Fourth Floor
Washington, DC 20552

RE: Proposed Rule on Private Transfer Fees, (RIN) 2590-AA41

Dear Mr. Pollard:

I write to voice my support and concerns with the Proposed Rule RIN 2590-AA41.

- I favor the prohibition of investor fees charged at sale of units. Such fees only pad the broker's bottom line with no benefit to the HOA.
- I favor the allowance of HOA's to continue collecting "transfer fees" (we call them "move-in/move-out" fees) which help defray the cost of Association maintenance and upkeep especially as related to transferred ownership.
- I oppose the provision that restricts the use of such fees paid to the Associations. Please understand that California State law already outlines what Association monies can legally be used for, and that use is exclusively for "preserving, protecting and enhancing the property". Another federal clause is redundant at minimum and could lead to unintended consequences at worst. Associations are models of democracy; there is no need for Federal micro-management here.
- I oppose the mandate to allow non-residents use of the common areas and that we must charge a fee for this access. As of now, non-residents may use common areas at the invitation of residents restricted only by the Association rules that already govern residents (which were approved by the residents). There is no need for Federal micro-management here.
- I oppose the "1000 yard" requirement. Any Association property, without regard to proximity to any other part of the Association is still Association property and we are required to maintain that part too. Why would you arbitrarily discard part of Association property? Makes no sense. There is no need for Federal

micro-management here.

Fees paid to an Association are used for the Association. Every buyer in California is informed in writing of any fees attached to the transfer.

Thank you for your consideration.