

From: JTAVIOLI@aol.com
Sent: Tuesday, April 05, 2011 11:51 AM
To: !FHFA REG-COMMENTS
Subject: RIN2590-AA41

I write in reference to the Proposed Rule on Certain Private Transfer Fee Covenants. While it has become clear that some developers create a transfer fee as a sort of annuity for themselves, and this practice should be stopped, a fee at point of purchase that supports major repairs and renovations of a Community Association is essential to the continued well being of communities managed by such associations. As a member of the board of the Kiawah Island Community Association, I can assert that the transfer fee we have in place keeps the annual assessments of our members at a reasonable rate and permits the association to maintain roads and other shared amenities in good condition. I urge, therefore, that you not change the ability of Community Associations to collect transfer fees and hold them in a fund for useful maintenance and renovation of their communities as you consider RIN2590-AA41

Joan T. Avioli
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