From: Gary Griffin [ggriffin@gwmgt.com] Sent: Wednesday, August 25, 2010 3:24 PM To: !FHFA REG-COMMENTS Subject: Transfer fees

Almost every industry is beginning to charge and be compensated on a per piece basis. That being the case an association that has no sales or very few will not require as much of a management firms time to administer and respond to lenders. Those that have many sales or transfer of ownerships will require more time than may have been allowed in the fixed management fee quoted.

It is not fair to the service provider of the association that they cannot be compensated on a measureable basis for the effort required to change the database and charge what most of us have always termed a transfer fee. It is intended to compensate for the time and effort that would not have been required had the property not changed ownership.

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