

From: Erv Fleishman MD [ervserve@gmail.com]
Sent: Tuesday, September 21, 2010 6:33 PM
To: !FHFA REG-COMMENTS
Subject: Guidance on Private Transfer Fees Convenants

These are additional comments.

When mandatory membership fees are necessary for initiating and purchase of a equity position in a country club, even if the price of the unit were three hundred thousand dollars for example, often the amount of money required for the transfer fee or membership is greater then the money necessary to be put down to obtain a mortgage.

That money does not benefit the property, but does make it much more difficult to sell the property as the next buyer is faced with coming up with the cash.

To have transfer fees such as mandatory membership in country clubs is damaging to the value of real estate and these mortgages should not be insured. By institution of this regulation, market forces will come into play and mandatory membership will come to an end and then the distortion in real estate values in these communities will be self corrected by market forces.

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