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Sent: Wednesday, September 29, 2010 5:05 PM
To: !FHFA REG-COMMENTS
Subject: Guidance on Private Transfer Fee Covenants, (No. 2010-N-11)

Attachments: TransferFeeAdvantages-9-20-10.docx

Dear FHFA,

My name is Jody McAuley and I am the President of the Homeowners Association in I'On - a neighborhood of 762 homes located in Mount Pleasant, SC. Our community has been following the proposal to limit Fannie Mae, Freddie Mac and the GSE's to stop investing in mortgages on properties encumbered by private or deed-based transfer fees.

We collect deed based transfer fees in I'On. I'On uses these important fees in a prudent manner to contribute to capital reserves, to rebuild community infrastructure, to help fund non profits, to promote cultural, educational and environmental conservation and to one day, rebuild our neighborhood after a natural disaster such as a hurricane. I'On collects .25% on the sale price of each home. .10% goes to the Trust and .15% goes to build the neighborhood reserve fund.

The Trust has been collecting the funds for over 10 years. Two years ago the neighborhood voted with a 75% majority to collect these fees for the community reserve fund. We updated our PD through the town formally to include these collections. Clearly the prudent decision to collect these responsible fees was organically developed and not implemented by the developer of our neighborhood.

I asked our Trust director, Anne Register, to give the FHFA an understanding of how important these funds are for her organization and what specifically the funds are used for. I hope you will use our situation in I'On to reconsider your stance that all deed based transfer fees are equal.

We ask specifically that (1) the FHFA sees the distinction between transfer fees that provide no current or future benefit to the community and those that do; and (2) that any regulation of private transfer fee covenants needs to specifically exempt beneficial transfer fees that are payable exclusively to homeowners associations (HOA) and 501 (c) (3) organizations.

On behalf of all 762 residents in this community we ask that you please consider this proposal carefully. (Community Web Page:
http://ioncommunity.com/outside_home.asp)

Thank you for your consideration.

Sincerely,

Jody McAuley

HOA Board President

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