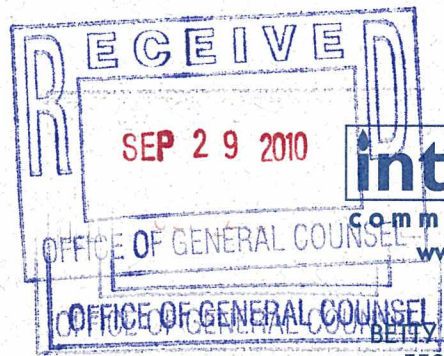


September 24, 2010

Alfred M. Pollard, Esq.
General Council, Federal Housing Finance Agency
Fourth Floor
1700 G Street NW
Washington, DC 20552
Attention: Public Comments



interfaith
community services
www.interfaithservices.org

HELPING PEOPLE HELP THEMSELVES

BETTY & MELVIN COHN CENTER
550 W. Washington Ave., Ste B
Escondido, CA 92025
Tel: (760) 489-6380
Fax: (760) 740-0837

Subject: **OPPOSE BAN ON TRANSFER FEES USED FOR CHARITABLE PURPOSES**

COASTAL SERVICE CENTER
2195 Oceanside Blvd.
Oceanside, CA 92054
Tel: (760) 721-2117
Fax: (760) 721-0351

Dear Mr. Pollard:

Banning transfer fees for charitable purposes will cut funding to thousands of homeless individuals: North County Interfaith Council, Inc., dba Interfaith Community Services, as a beneficiary of charitable donations that originate from transfer fees, stands to suffer greatly from the loss of invaluable support that such a ban would place. In the last year alone such benevolent contributors in this manner have helped Interfaith Community Services provide:

- o 55 Shelters;
- o 235 Beds; and
- o 167,600 Meals.

The transfer fee is nominal and non-intrusive: The fees borne by the parties privy to the transaction truly are de minimis in amount, and especially so as compared to the value of the asset being transferred. Furthermore, said parties continue to show support for the end usage of fees collected when allocated for charitable causes.

We supports solely the use of transfer fees to better surrounding communities: Creating exclusionary language allowing non-profits the opportunity to continue to benefit from this unique source of revenue does not benefit solely non-profits and their beneficiaries but as well legislators and further the local communities as a whole.

No hidden fees, no hidden agenda: California Civil Code Section 1098.5 requires full disclosure to those responsible for payment all transfer fees associated with the encumbered asset (property). As well, charities continue to provide the utmost transparency and ensure that the funds collected are used in a manner that behooves the public's interest (as deemed so by the IRS and other external auditors).

Bottom line: Last year over 35,000 persons have had their lives changed by Interfaith Community Services, in one form or another, resulting from the support of organizations benefiting from transfer fees.

Best Regards,

Suzanne Stewart Pohlman
Executive Director

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Suzanne Stewart Pohlman