

From: Rob Levin [rob@roblevin.net]
Sent: Friday, October 01, 2010 9:44 AM
To: !FHFA REG-COMMENTS
Subject: Guidance on Private Transfer Fee Covenants, (No. 2010-N-11)

To Whom It May Concern:

I am writing concerning the FHFA's proposal to eliminate the use of private transfer fees (Guidance No. 2010-N-11).

I urge the FHFA to distinguish between transfer fees that provide a benefit to the community by supporting a charitable purpose from one that only benefits private interests.

I represent many different nonprofit charitable organizations, and the FHFA's blanket treatment of all transfer fees would be a disservice to these charities or the communities they support.

I respectfully request that the FHFA:

- (1) Insert an exception for tax-exempt organizations' use of transfer fees;
- (2) Continue to support homes and homeowners with community-benefits fees;
- (3) Support reasonable Community-Benefits Fee Standards that distinguish between community-benefits fees (charitable purpose) and abusive fees that benefit only developers;
- (4) Allow communities to freely associate to support community services, schools, affordable housing, and conservation with no new taxes; and
- (5) At a minimum, extend the comment period through January 30, 2011.

Thank you for your time,

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