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Public Comments on Proposed Guidance; Request for Comments: Private Transfer Fee Covenants:=====

Title: Proposed Guidance; Request for Comments: Private Transfer Fee Covenants  
FR Document Number: 2010-20108  
Legacy Document ID:  
RIN: null  
Publish Date: Mon Aug 16 00:00:00 EDT 2010  
Submitter Info:

Dear sirs:

This is my statement of approval for the use of Private Transfer Fees used for both commercial and residential real estate developments.

With the housing and commercial building business in such a devastation condition, it would be foolish to remove a resource of growth that will influence this market in such a positive way.

Private Transfer Fees are a win-win for everyone involved in the process - The government in collecting taxes on the transaction, the developer for paying for infrastructure, banks for being able to reduce liability by paying down loans, buyers for spreading the cost of infrastructure over a long period of time and not upfront for the original buyer.

The objections by the National Association of Realtors is one of selfishness so they don't have to be bothered with explaining the details of Private Transfer Fees. How lazy is this position?

I'll take win-win anytime and let's face it, our economy can use it and the stimulus it creates.

Thank you,

John Rist