From: Cal Skaggs [cal@lumiereproductions.com] Sent: Monday, October 04, 2010 3:45 PM To: !FHFA REG-COMMENTS Subject: Guidance on Private Fee Covenants (NO 2010-N-11) Dear Sikr or Madam:

As president of my co-op board at 31 Gramercy Park South in New York City, I write to ask you please not to restrict financing on co-ops with private transfer fees. Our building was built in 1861; it houses 11 individuals or families in 11 units. Because of the building's age, we have had to replace wiring, roof beams and roof, sidewalk, etc. We now need new plumbing throughout the building. The transfer fees we collect on the sale of apartments has allowed us enough income to make prior repairs without having to raise monthly maintenance charges so high that some people living in the building would simply be forced to move out. Please allow us to continue to collect transfer fees.

Cordially,

Cal Skaggs

--Cal Skaggs Lumiere Productions, Inc. 26 W. 17th Street, Suite 803 New York, NY 10011 212/807-0796 cal@lumiereproductions.com