

From: Peter Janovsky [pjanovsky@zeklaw.com]
Sent: Thursday, October 07, 2010 12:45 PM
To: !FHFA REG-COMMENTS
Subject: Guidance on Private Transfer Fee Covenants, (No. 2010 - N-11)

As a Board Member of 91 Central Park West Corp, a 91 unit cooperative on Manhattan's Upper West Side, I strongly disagree on the above captioned proposal. Our Board deplores the proposal which would deprive us of transfer fee revenues used to fund capital projects essential properly to maintain our building, constructed in 1929 and a cooperative since 1961. There are no insider sponsor profits gleaned from our transfer fees which go exclusively for the benefit of all our residents. We urge FHFA to protect the rights of established cooperatives such as ours by explicitly exempting us from any new proposed restrictive regulations.

Peter Janovsky

Vice-President

91 Central Park West Corp.