

From: Edward McNeal [ecm723@bex.net]
Sent: Monday, October 11, 2010 5:17 PM
To: !FHFA REG-COMMENTS
Subject: Proposed Federal Prohibition on Private Transfer Fees

I have been informed of proposed legislation that would be harmful to land and water conservation and therefore writing to comment on FHFA's proposed guidance document that would effectively eliminate the use of all Private Transfer Fees.

One facet beneficial that I support is the use of private transfer fees when they benefit land and water conservation, the homeowner, the home owners association or provide another specific community benefit through payment to a non-profit or home owners' organization. I am asking FHFA to delay consideration of the proposed guidance through January 30, 2011 to allow for informed decision-making that fully considers the implications of the proposed harsh change.

I 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, to allow for fully informed decision-making that fully considers the implications of the proposed harsh change.

Thank you in advance for your consideration

Edward McNeal

Board Member

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