From: JenniMae DeKorte [jdekorte@silverleafclub.com]
Sent: Tuesday, October 12, 2010 1:38 PM
To: !FHFA REG-COMMENTS
Subject: Private Transfer Fee Covenants, (No. 2010-N-11) - Please Reject As
Written

Mr. Pollard:

I am writing to urge you to REJECT the proposed guidance No. 2010-N-11 relating
to private transfer fees as it is currently written.

The abusive practice of using transfer fees for purely private gain can be
curtailed without disturbing the legitimate use of transfer fees for homeowner
or community benefits. As proposed, this guidance would have a severe negative
impact on the operations of homeowners associations, environmental groups and
affordable housing programs that rely on these disclosed fees for their
operations. A transfer fee has a real value to a community when used in specific
circumstances that benefit the homeowner or community, such as use by homeowners
associations (HOAs), non-profit organizations, or governmental agencies to build
and maintain community enhancements or promote important community benefits such
as open space, affordable housing, and transit improvements.

With a high percentage of mortgages (by some estimates 90 percent) insured or
backed by Freddie Mac or Fannie Mae, this proposal would effectively preclude
the use of transfer fees for community benefits, removing a critical tool for
building strong communities and dealing another blow to homeowners at a time
when the markets are struggling to recover.

Approval of this guidance as written is ill-advised and should be REJECTED. The
FHFA should instead adopt transfer fee standards that protect community benefits
while prohibiting abusive fees that are used solely for private gain.

At a minimum, the comment period should be delayed and extended for a
significant time to allow for the thoughtful and transparent consideration of
the impacts of such a change.

Sincerely,

JenniMae DeKorte
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