From: Doug Orchard [dorchard@duncanlawcorp.com]

Sent: Tuesday, October 12, 2010 4:41 PM

To: !FHFA REG-COMMENTS

Subject: Support new guidelines -- eliminate transfer fees

I'm voicing my support in new guidelines that would prohibit Fannie & Freddie to purchase residential mortgages encumbered by transfer fees. I know of a group called 'Freehold' which really promoted their concept on a 'for profit' basis that seemed very one-sided for their own organization and the few that could get their properties encumbered and provide a 'No Value Added' annuity for generations to their stated beneficiary.

This seems to me to be a very bad policy of designed to benefit a minority. We need to leave our properties in the US unencumbered generationally.

I support the proposed guidance to prohibit Fannie & Freddie from purchasing residential mortgages that are encumbered by transfer fees.

Thank you,

Douglas L. Orchard

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