From: Breffni J. McGeough [breffni@yahoo.com] Sent: Thursday, October 14, 2010 12:49 PM To: !FHFA REG-COMMENTS

Subject: Guidance on Private Transfer Fee Covenants No. 2010-N-11

How can you possibly be against these covenants or private transfer fees when they are

the "Key" to providing relief for otherwise financially ruined developers and landowners who are struggling under mountains of debt in excess of the present total value of the land they are otherwise saddled with? What is your suggested solution to this financial melt down?? More Foreclosures, more short Sales, More Deeds in Lieu???

More financially ruined American families, less construction jobs? less work for the local

building departments of the various cities. More unsightly vacant parcels of land in our

city centers where this situation has local government pitted against developers having

them fill in the hole they spent millions digging only to be told to build the building or fill back in the very same hole they have just gone broke digging ?

The future fees allow the developer to proceed with the otherwise "Frozen" development

projects while allowing them to sell the homes or units at a lower price now knowing they

will benefit from a small income along the road to recovery in the name of becoming "Whole" through these future fees over time. These covenants allow the wheels of commerce to turn and the recovery to begin while you are sticking steel bars in the very

spokes of these very same wheels. I am very disappointed to see your effort extended in

the name of our Government to dismantle what would otherwise be the "Great Lube and

Oil Change" the industry so desperately needs at this critical, crucial and monumental time. Be the Government for the people, just this once. Imagine that?