

From: Tiffany Matteau [TMatteau@barroncollier.com]
Sent: Thursday, October 14, 2010 5:03 PM
To: !FHFA REG-COMMENTS
Subject: Guidance on Private Transfer Fee Covenants, (No. 2010-N-11)

To Whom It May Concern:

As one of the largest land developers/owners in Florida, Barron Collier Companies would like to express its concern with the proposed Guidance on Private Transfer Fee Covenants. While we support FHFA's efforts to curtail the practice of developers continuously collecting a fee based on a percentage of the purchase price of a home resale, our organization believes that if the proposed guidance is adopted, there will be a detrimental effect on the ability for community associations to collect the more traditional, and minimal, community-benefits fees.

Therefore, we request that the FHFA: (1) Continue to support communities, and homeowners with community-benefits fees; (2) support reasonable community-benefits fee standards that distinguish between community-benefits fees and abusive fees that benefit only developers; (3) allow communities to freely associate to support community services, schools, affordable housing, and conservation with no new taxes; and (4) at a minimum, extend the comment period through January 30, 2010, to allow for informed decision-making that fully considers the implications of the proposed change.

We support the use of private transfer fees when they benefit the homeowner, the homeowners association, or provide a specific community benefit through payment to a non-profit or homeowners organization.

Sincerely,

Blake Gable

President

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