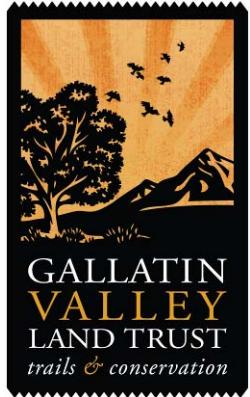


October 14, 2010

Alfred M. Pollard
General Counsel, Federal Housing Finance Agency
Fourth Floor
1700 G Street, NW
Washington, DC 20552



RE: Guidance on Private Transfer Fee Covenants (No. 2010-N-11)

Dear Mr. Pollard,

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

The use of transfer fees for purely private gain is clearly an abuse of this tool, and can be curtailed without disturbing the legitimate use of transfer fees for community benefits. We support reasonable transfer fee standards that distinguish between community-benefits fees (charitable purpose) and abusive fees that benefit only developers. However, as written, this proposed guidance would have a severe negative impact on the operations of homeowners associations, conservation organizations and affordable housing programs that rely on these disclosed fees for their operations. A transfer fee can be an invaluable tool for specific circumstances that benefit a community, such as use by homeowners associations (HOAs), non-profit organizations, or governmental agencies to build and maintain community enhancements or promote important public benefits such as community services, schools, land and water conservation, 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. 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 must be extended through January 30, 2011 to allow fully informed decision making that fully considers the implications of the proposed change.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Burnaby Wright".

Kate Burnaby Wright
Stewardship Coordinator