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Public Comments on Proposed Guidance; Request for Comments: Private Transfer Fee Covenants:=====

Title: Proposed Guidance; Request for Comments: Private Transfer Fee Covenants

FR Document Number: 2010-20108

Legacy Document ID:

RIN: null

Publish Date: Mon Aug 16 00:00:00 EDT 2010

Submitter Info:

Dear Mr. Pollard,

Please reject the proposed guidance for Private Transfer Fees.

As a property owner and tax payer I see no reason to restrict the free market efforts to creatively fund existing and new real estate projects, especially in the current market. Transfer Fees can generate more funding options without financing or added Taxes, like a MUD Municipal Utility District. More funding means fewer failures of existing projects, for new projects and has to help with existing and new real estate and construction related JOBS! I'd much rather pay a Transfer Fee when I sell my property rather than have to pay an added MUD Tax every year.

Since Transfer Fees are a deed restriction they are conspicuously disclosed in any real estate transaction. If this is not uniform across the country then a more appropriate action would be to establish uniform disclosures across the country but please don't try to undermine free market funding options.

Transfer Fees used for years in California as an alternative funding vehicle for developers, builders and home owner associations. If the proposed guideline is approved it will harm thousands of existing home owners by artificially restricting the financing options for them when they refinance or sell their property ? WHY?

What has been the big harm from Transfer Fees?

I appreciate this opportunity to comment and to request you do what is necessary to stop the proposed guidance.

Anthony K Gregory