

VILLAGO COMMUNITY ASSOCIATION

1311 W. Chandler Blvd. Suite 130
Chandler, AZ 85224

October 15, 2010

The Honorable Alfred M. Pollard, General Counsel
Federal Housing Finance Administration
1700 G. Street, NW 4th Floor
Washington, DC 20552

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

Dear Mr. Pollard:

As the President of the Villago Homeowners' Association, I would like to offer the following comments to the FHFA with respect to private transfer fees. Villago is a planned community located in Casa Grande, Arizona. It is in the early stages of development. The community is planned for approximately 5,000 homes with about 600 homes currently constructed and occupied. Our community is targeted for entry level to first move-up homeowners with home prices currently starting at \$120,000.00.

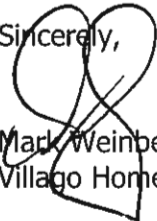
Our community's primary amenities include parks, walking trails and landscaped common areas. We take pride in our community. In order to maintain our community and continue to provide the same environment for future homeowners, we rely on two sources of revenue, monthly homeowner dues and private transfer fees. Both of these fees are critical to maintaining our community.

If the transfer fee is eliminated, our only alternative would be to increase the monthly dues. This, in turn, would make it more difficult for new buyers to qualify and existing homeowners to service their existing mortgages.

Clearly, private transfer fees that go only to support the operations of non-profit community homeowners' associations play an important role in maintaining community amenities, helping homebuyers qualify for new homes, and helping existing homeowners continue to pay their existing mortgages.

For these reasons, we highly recommend that private transfer fees which benefit non-profit homeowners' associations in connection with FHA mortgages be allowed.

Sincerely,


Mark Weinberg,
Villago Homeowners' Association

MW:lf