

From: Julie B. Higgins [juliebhiggins@sbcglobal.net]
Sent: Wednesday, September 29, 2010 2:52 PM
To: !FHFA REG-COMMENTS
Cc: 'Kevin Joyce'
Subject: Guidance on Private Transfer Fee Covenants, (No. 2010-N-11)

Sirs/Madams,

Please delay consideration of the proposed referenced guidance through January 30, 2011 to allow for informed decision-making that fully considers the implications of the proposed harsh change.

Specifically, I support the use of private transfer fees when they benefit land and water conservation, the homeowner, the HOA or provide another specific community benefit through payment to a non-profit or home owners' organization. I am on the board of a land conservancy organization that includes a stewardship fee in virtually every conservation easement drafted. Your proposed prohibition would have a devastating effect on our ability to raise adequate financial resources to meet our perpetual stewardship obligations.

Your consideration is appreciated.

Julie Brotje Higgins, Ph.D., CFA
Partner
THE TRUST COMPANY of Toledo, N.A.
1.419.494.9289

Email and Address Change:
office email: jhiggins@ttcot.com
(direct email remains the same: juliebhiggins@sbcglobal.net)

Office address effective September 17:
1630 Timberwolf Drive
Holland, Ohio 43528