

From: Talbot B. Kramer, Jr. [tbkesq@aol.com]
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To: !FHFA REG-COMMENTS
Subject: Guidance on Private Transfer Fee Covenants, (No. 2010-N-11)

I would urge that this regulation not be adopted. As an attorney who represents numerous condominium and homeowners' associations, such a regulation would be seriously detrimental to their ability to fund their capital reserves. Fees charged at the time of sale of a unit provide of principal means such associations often fund their capital reserves, and to use this practice as a disqualifier for funding under these various programs would place most associations in a position of having to make an impossible choice. I urge that this regulation not be adopted.

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