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

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Submitter Info:

Re: Guidance on Private Transfer Fee Covenants (2010-N-11)

Please do not restrict financing on cooperatives with private transfer fees. These fees are a crucial tool helping provide affordable amenities to well-planned communities. We consider the proposal harmful to our residents. The transfer fees we collect are used to fund needed capital improvements to our building and replace aging systems. Without transfer fees, our Board would have to substantially increase monthly charges and/or impose assessments to maintain the building, which would inflict financial hardship on our shareholders.

Our flip tax fees are used for capital improvements. If we had to significantly raise maintenance, which would happen if we had no flip taxes, some of our shareholders would be in deep trouble, and could default. This would be very bad for our coop.

Thank you for your attention.

Sincerely,
Edwina Williams
Board of Directors
91 Payson Owners Corp
New York, NY 10034