

Mr. Alfred M. Pollard
General Counsel
Federal Housing Finance Agency
4th Floor
1700 G. Street North West
Washington DC 20552

RE: Public Comments "Guidance on Private Transfer Fee Covenants, (#2010-N-11)"

Dear Mr. Pollard:

On behalf of Solar Point Resources, LLC, I appreciate the opportunity to present our comments to the Federal Housing Finance Agency ("FHFA") regarding the "Guidance on Private Transfer Fee Covenants" (No.2010-N-11) ("Guidance"). For the reasons set forth herein, Solar Point Resources, LLC is in opposition to the Guidance as currently written. While we believe there may be legitimate concerns over the misuse of private transfer fees, we believe that the Guidance as proposed will have widespread adverse impacts by restricting private transfer fees that provide cost effective financing for projects with valuable private and public benefit. The benefits affected by the proposed Guidance include the funding of renewable, clean and efficient energy projects, natural resource conservation, affordable housing, and private funded infrastructure projects.

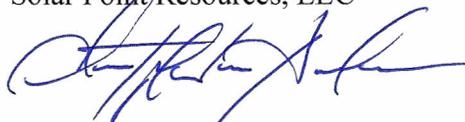
We are involved in legitimate efforts to provide affordable renewable, clean and efficient energy solutions to address the world wide climate crisis, improve our energy security, and provide for economic growth. The clean energy market is projected to attract \$230 billion in annual investment by 2020. If America steps to the forefront of clean energy, we can dominate this global market and generate millions of jobs here at home. The single largest deterrent to the proliferation of the clean energy market is cost. The use of private "beneficial" transfer fees provides for significant cost reductions in the acquisition and installation of renewable and clean energy systems such as solar power systems. Private "beneficial" transfer fees are dedicated to improvements that provide current and future benefit to the property encumbered by the covenant.

Private "beneficial" transfer fees allow homeowners to afford to acquire renewable, clean and efficient energy systems thereby increasing home values while simultaneously lowering the homeowners operating cost through energy savings resulting in a significant increase to the security

of the lender's position. The lender's position in the property is enhanced by the value of the installed equipment and the energy cost savings which allow the borrower to have more available income to service existing mortgage debt. Given the limited amount of available public financial resources, the use of private "beneficial" transfer fees is critical to the proliferation of renewable, clean and efficient energy systems to address the world wide climate crisis.

We strongly urge the FHFA to withdraw their Guidance as currently written. Alternatively, we would ask the FHFA to revise the proposed guidance to address adequate disclosure and allow for private "beneficial" transfer fees that fund renewable, clean and efficient energy projects, natural resource conservation, affordable housing, private funded infrastructure projects, and support community benefits.

Sincerely,
Solar Point Resources, LLC

A handwritten signature in blue ink, appearing to read "Chris Hawke", written over the printed name.

Christopher M. Hawke
Chief Executive Officer