



April 11, 2011

Mr. Alfred M. Pollard
General Counsel
Federal Housing Finance Agency
Fourth Floor
1700 G Street, NW
Washington, DC 20552

ATTENTION: Public Comments on RIN 2590-AA41 [Fannie Mae, Freddie Mac and the Federal Home Loan Banks: Restrictions on the Acquisition of, or Taking Security Interests in, Mortgages on Properties Encumbered by Certain Private Transfer Fee Covenants and Related Securities]

Dear Mr. Pollard:

The Coalition to Stop Wall Street Home Resale Fees applauds your efforts to stop the spread of predatory for-profit transfer fees through this proposed rule. FHFA's rule, combined with the efforts of 24 state legislatures, has gone a long way to protecting homeowners from having to pay off an unaffiliated third party to sell their home.

As you know, Wall Street Home Resale Fees (otherwise known as Private Transfer Fees) require that every time a home is sold for the next 99 years, a percentage of the sale price of the home (usually 1%) be paid back to the third party. While the third party gets rich off the stream of fees, homeowners suffer by paying thousands of dollars to sell their home. This transfer of wealth from Main Street to Wall Street reduces homeowner's equity and makes it more difficult to sell a home. These pernicious effects are further amplified during a depressed market like we are currently seeing.

This proposed rule recognizes the danger the Resale Fees pose not only to homeowners, but also the public and Fannie Mae and Freddie Mac. Further, we are pleased to see that you have recognized the benefits for homeowners when these fees are directed to homeowners and condo associations for community improvements or financial reserves and have exempted them from the proposed rule. These beneficial community fees differ from the purely private transfer fee and should be allowed.

Thanks to FHFA's efforts we can see the light at the end of the tunnel for protecting homeowners from these predatory fees. We encourage FHFA to stay on this path and finalize this strong consumer protection rule. Working together we can stop future homeowners from being forced to pay for the right to sell their own home.



The following groups are **members** of the Coalition to Stop Wall Street Home Resale Fees:

Institute for Liberty
Consumer Federation of America
Consumers Union
Hawaii Advocates for Consumer Protection
Property Rights Alliance
American Land Title Association
Center for Responsible Lending
National Real Estate Investors Association
Vote Vets
American Federation of State
County and Municipal Employees (AFSCME)
Americans United for Change
USAction
Service Employees International Union (SEIU)
National Association of REALTORS (NAR)
Transport Workers Union (TWU)
International Federation of Professional and Technical Engineers (IFPTE)
Labor Council for Latin American Advancement (LCLAA)
Office & Professional Employees International Union (OPEIU)
Massachusetts Affordable Housing Alliance
Georgia State Trade Association of Nonprofit Developers
Interfaith Housing Center of the Northern Suburbs
Washington Asset Building Coalition
New York Land Title Association
Idaho Realtors Association
Idaho Land Title Association
Virginia Housing Coalition

Sincerely yours,

Ricardo Medina
Coalition to Stop Wall Street Home Resale Fees
& Members