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

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I support Private Transfer Fees. Disclosure is a must for properties that are part of the program. This is a vital way in which property owners and developers can raise capital to offset infrastructure, development, construction and amenities that are difficult, if not impossible, to fund in our current market.

These Private Transfer Fees would help in lowering the cost to develop a property and construct a home, spreading the cost associated with the project over 99 years, as the home/property changes hands. The 1% fee is nominal, but the capital raised to help get a project off the ground is an enormous benefit to the developer and the end home owners purchase of the home/property. The upfront costs incurred to launch a development is huge. This would lower the costs significantly and spread the infrastructure over the 99 year term that the re-conveyance fee runs.

I am very supportive of the Private Transfer Fee program.

Gadson H. Woodall, III