

From: Eric Kraus - aquablokinfo.com [ekraus@aquablokinfo.com]
Sent: Tuesday, October 12, 2010 9:36 AM
To: !FHFA REG-COMMENTS
Cc: kjoyce@blackswamp.org
Subject: Guidance on Private Transfer Fee Covenants, (No. 2010-N-11)

I am writing to comment on FHFA's proposed guidance document that would effectively eliminate the use of all Private Transfer Fees.

I support the use of private transfer fees when they benefit land and water conservation, the homeowner, the home owners' association or provide another specific community benefit through payment to a non-profit or home owners' organization. The FHFA must delay consideration of the proposed guidance through January 30, 2011 to allow for informed decision-making that fully considers the implications of the proposed harsh change.

I request that the FHFA: (1) Insert an exception for tax-exempt organizations' use of transfer fees; (2) Continue to support homes and homeowners with community-benefits fees; (3) Support reasonable Community-Benefits Fee Standards that distinguish between community-benefits fees (charitable purpose) and abusive fees that benefit only developers; (4) Allow communities to freely associate to support community services, schools, affordable housing, and conservation with no new taxes; and (5) At a minimum, extend the comment period through January 30, 2011, to allow for fully informed decision-making that fully considers the implications of the proposed harsh change.

Eric Kraus

Toledo, Ohio