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

Title: Proposed Guidance; Request for Comments: Private Transfer Fee Covenants  
FR Document Number: 2010-20108  
Legacy Document ID:  
RIN: null  
Publish Date: Mon Aug 16 00:00:00 EDT 2010  
Submitter Info:

Please amend your rules to allow Co-ops and Condos to continue to maintain transfer fees (i.e. flip-taxes), without being affected by this ruling. Co-ops and condos boards use these fees to help maintain and enhance their properties. Without such a mechanism boards would be forced to either raise maintenance levels or issue assessments on shareholders - in each case putting additional financial burdens in place.

These transfer fees allow shareholders to effectively defer some of the financial burden until they leave the co-op/condo through sale of their shares/property.

This IS NOT a transfer fee that goes to an uninvolved third party.

The fee is directly connected to and helps to enhance the financial health of the property.

Thank you.

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