

CAI Calls on Communities to Comment on FHFA Proposal:

On August 16, 2010, the Federal Housing Finance Agency (FHFA) published a [Notice of Proposed Guidance](#) directing Fannie Mae, Freddie Mac and the Federal Home Loan Bank System (the GSEs) to stop investing in mortgages on properties encumbered by private or deed-based transfer fees. The Notice contains a discussion regarding FHFA's opinion that such restrictions would be beneficial for the mortgage markets and consumers and requests comment and opinions from interested parties on the proposal.

It is important that FHFA receive comments directly from your association describing how deed-based transfers are assessed, disclosed, received and used. Further, it is important for you to describe the specific impact on your association and homeowners if FHFA's proposed guidance is adopted without revision. NOTE: If your association has a fee charged at time of sale or transfer, that is not provided for in the deed, then you do not need to submit comments.

To facilitate your comments, CAI is providing instructions to file your comments, as well as a comment template discussing general concerns about FHFA's proposed guidance. [We stress that this is a template and your comment letter should be customized to describe the effect of FHFA's proposed guidance on your association and community.](#) The template is attached. For more information on this proposal, please see CAI's [FAQ](#).

Instructions on submitting comments on behalf of your association to FHFA:

Comment Due Date: October 15, 2010

Comments may be submitted by the following means:

- **E-mail:** Use the address regcomments@fhfa.gov and include the following in the subject line of the e-mail: *Guidance on Private Transfer Fee Covenants, (No. 2010-N-11)*
- **U.S. Mail:** Use the following address to send comments by U.S. Mail –
Mr. Alfred Pollard
General Counsel
Federal Housing Finance Agency
1700 G Street, NW
Washington DC 20552
ATTN: Public Comments “Guidance on Private Transfer Fee Covenants, (No.2010-N-11)”
- **Federal eRulemaking Portal:** Go to www.regulations.gov and follow the instructions provided to submit your comments electronically.
- **Send a copy to CAI!** Please send a copy to CAI so we can track the response rate. Send your comments to government@caionline.org, subject line: FHFA Comments or FAX to 703-684-1581 Attn: G&PA.

Additional Comment Information from FHFA: Additional comment information may be obtained by contacting Peggy Balsawer, FHFA assistant general counsel, at (202) 343-1529.

CAI Contact and Resources: If you have any questions for CAI, please send them to government@caionline.org with FHFA Comments in the subject line.