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July 9, 2024

Federal Housing Finance Agency  
Division of Bank Regulation  
400 7<sup>th</sup> Street SW, 7<sup>th</sup> Floor  
Washington, D.C. 20219

To whom it may concern:

Thank you for the opportunity to respond to the Federal Finance Housing Agency's request for input on the mission of the Federal Home Loan Banks. First Federal Savings Bank of Rochester, IN is a member of the FHLBank Indianapolis. First Federal Savings Bank of Rochester is a \$650 million community bank in Rochester, IN and I serve as the EVP-CFO and Treasurer.

We are a consistent user of advances from the FHLBank Indianapolis as well as a consistent participant in the Mortgage Purchase Program (MPP). These products and services are vital to our ability to serve our small community in northern Indiana. The FHLBanks provide stable, reliable liquidity to their members day in and day out through advances, and we have benefited greatly from that reliability. While this funding is vital during times of economic stress, it also serves to provide asset liability management support. The mortgage loans purchased from members through MPP directly support housing by allowing us to originate mortgages and sell loans to the FHLBank Indianapolis to make room on our balance sheet and continue to offer long-term fixed rated mortgages to our customers.

I am concerned that any effort to change the mission of the FHLB System, create new mission measurement calculations or create member incentives tied to member activity in affordable housing will have significant unintended consequences, which could materially alter the reliability of the FHLB System. The collateral we pledge to the FHLBank Indianapolis is consistent with the FHLB mission, and the loans we sell the FHLBank Indianapolis support the FHLB System

mission. In short, the FHLBank Indianapolis supports the important mission of providing liquidity and financing to support community and economic development through the products and services it offers. There are always opportunities to improve upon successful programs and I would encourage the FHFA to consider such improvements through continued expansion and increased flexibility, as opposed to limitations that may minimize our ability to utilize programs offered by the FHLBank Indianapolis to serve our community.

Sincerely,

A handwritten signature in black ink that reads "Amanda Morris-Feldman". The signature is written in a cursive style with a large initial 'A' and 'M'.

Amanda Morris-Feldman, CPA  
EVP-CFO & Treasurer, First Federal Savings Bank of Rochester