



July 9, 2024

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

To whom it may concern:

My name is Don Cates and I am the President and CEO of Three Rivers Federal Credit Union. We are a \$2.4 billion federal credit union located in Fort Wayne, IN. I am writing to respond to the Federal Housing Finance Agency's (FHFA's) request for information on the mission, mission measurement, and member incentives related to the products and services of the Federal Home Loan Banks.

The Federal Home Loan Bank statute seems very clear and unambiguous when it comes to mission. The applicable and existing statutes promote financial stability by providing a reliable, cost-effective source of liquidity to their members and support housing and community development efforts throughout the nation. Congress has consistently expanded the role and authority of the FHLBanks, since expanding membership to commercial banks and credit unions in 1989. As a credit union, we have benefitted from that expansion and today are one of the largest mortgage originators in the state of Indiana.

With recent liquidity challenges in the market, many of which stem from the quickest increase in short-term interest rates in history by the Federal Reserve to combat rising inflation, the role of the FHLBank System has once again proven to be of critical importance. The reliability and consistency of the FHLBank of Indianapolis has allowed our credit union to continue to confidently offer mortgages and other loan products to its members, even as we compete for deposits with other market alternatives sought by members. Actions by the FHFA to impinge upon the reliability and stability of the FHLBank System at this time borderline on reckless in my perspective, as community lenders will need to refactor their decisions and ability to serve communities when deposits become challenged. Uncertainty by definition creates risk and this proposal creates a significant amount of uncertainty for community lenders.

Thank you for the opportunity to respond to the Request for Information and I would encourage the FHFA to reconsider the proposed enhancements to clarify the System's mission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Don Cates', written over a white background.

Don Cates
President and CEO
Three Rivers Federal Credit Union