

July 15, 2024

Federal Housing Finance Agency
Division of Banking Regulation
400 7th Street SW
Washington, DC 20219

Re: RFI FHLBank Mission

On behalf of First National Bank Minnesota, I am writing to express my concerns with changes which may occur as a result of items in the RFI, specifically those dealing with mission change and the potential to disrupt the liquidity potential of the FHLB system.

We are a relatively small community bank and rely on the FHLB for both our current use of its liquidity options, as well as having the FHLB as a reliable long-term source of liquidity. Any disruption of either the current or long-term potential for liquidity would greatly harm our ability to lend, as well as potentially lessen our ability to continue as a locally owned community bank.

For that reason we ask that the FHFA take into account the following:

- The FHLB's were organized with congressional action and any change in mission or other powers need to be done by that body because they are responsible to the people who elect them, and the people they answer to are the beneficiaries of the services we provide supported by the FHLB's
- The FHLB bank have performed for nearly a century without a loss, and consequently have become a source of reliance for community banks like ours. Any disruption, or hint of disruption with the FHLB system could severely impact our ability to continue making home loans and providing us a solid trusted source of liquidity.
- Finally, the FHLB system is not broken so we ask that you do not change it. The FHLB is embedded in the way community banks fund their real estate lending and are provided the necessary liquidity to do so.

For over 90 years, the Federal Home Loan Bank System has served as a reliable and critical source of funding for community banks like mine. The System works well and has proven so repeatedly. Please do not make changes to the FHLB mission that will harm community banks.

Sincerely,



Michael W. Bresnahan
President & CEO

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