RE: Comments to RFI on the FHLB System

To Whom It May Concern,

We are a $650MM bank located in the heart of Iowa. Our bank has very strong feelings regarding the mission of the FHLB system which is to provide liquidity to their members in support of housing and community development. Congress has authorized the types of institutions eligible for membership and the requirements for them to access liquidity and other products and services. Congress is responsible for the FHLB mission, not the FHFA.

Since Congress created the FHLB system and its mission, any changes to said mission should be determined by Congress, not the FHFA. The FHLB is critical to providing adequate liquidity to our financial institution. We urge the FHFA to ensure that all current FHLB members continue to have the same access to it as they do today.

Furthermore, Congress did not authorize membership categories or tiers that the RFI is contemplating. All members of the FHLB system have a strong and demonstrable connection to the mission of this system, and they should continue to have the same access to FHLB liquidity, on equal terms.

Thank you,

Kevin Bolt

Senior Vice President