



**MONTANA
BANKERS
ASSOCIATION**

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The Honorable Sandra Thompson
Director
Federal Housing Finance Agency
400 7th Street, SW
Washington, DC 20219

Re: Federal Home Loan Bank Mission RFI (<https://www.fhfa.gov/sites/default/files/2024-05/FHLBank-Mission-RFI-2024.pdf>)

Dear Director Thompson,

On behalf of the Montana Bankers Association (MBA), please accept these comments in response to the Request for Input (RFI) published by the Federal Housing Finance Agency (FHFA) regarding the Federal Home Loan Banks' (FHLB) Core Mission Activities and Mission Achievement.

Along with other state bankers' associations and the American Bankers Association, MBA is a signatory to a joint comment letter submitted to FHFA that provides detailed feedback on the questions posed in the RFI. MBA and our board of directors strongly support the views expressed in the joint letter. However, we also wanted to provide FHFA with some additional feedback specifically related to our situation in Montana.

MBA represents 31 small, regional, and large banks operating within Montana and serving our rural communities. I have heard directly from many of our members how the liquidity provided through FHLB advances is a critical component of their bank's ability to succeed. These banks are the lifeblood of their communities' Main Streets. Should they be weakened for want of liquidity, efforts to increase affordable housing and spur community development in rural Montana will falter.

We appreciate FHFA's efforts to gather public input regarding the Comprehensive Review and the recommendations therein. Unless Congress directs otherwise, FHFA should avoid actions that would diminish FHLB's mission of providing liquidity to its members.

Thank you,

Sam Sill,

Montana Bankers Association, President/CEO