



July 11, 2024

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

RE: RFI of 5/16/2024

On behalf of First State Bank Southwest, 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 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 consider 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 banks 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 with a solid trusted source of liquidity.

Finally, if it isn't broken, please don't change it. The FHLB is imbedded in the way community banks fund and work. If FHFA makes changes when something has been provided to work for nearly 100 years, and it breaks, not only will it reflect poorly on the FHFA, but more importantly it will ruin probably the most beneficial source of residential funding that has ever been invented which is a wide range of locally positioned community lenders.

Sincerely,

Mark Vis, President
First State Bank Southwest