



Federal Housing Finance Agency

400 7th Street, SW

Washington, DC 20024

Via email: <https://www.fhfa.gov/AboutUs/Contact/Pages/Request-for-Information-Form.aspx>

October 25, 2022

RE: FHLBank System at 100: Focusing on the Future

The Tennessee Bankers Association (TBA) is a not-for-profit trade association representing 177 member banks – chartered both in Tennessee and out-of-state. The association was founded in 1890 to represent and support Tennessee banks, enabling them to provide a full range of quality financial products and services while maintaining safety and soundness. Today, TBA provides continuing education, develops and monitors state and federal legislative agendas, disseminates information on all facets of the financial services industry, and promotes the public image of financial institutions.

Nearly 120 TBA member banks are stockholders in the Federal Home Loan Bank of Cincinnati (FHLB). The FHLB plays a critical role in meeting various needs of these banks, including liquidity management, interest rate risk management, Mortgage Purchase Program, advances, letters of credit, safekeeping, affordable housing, competitive return on the stock investment required for membership, and participation in educational programs.

The services provided by FHLB to Tennessee banks are not only helpful to the banks but also their customers and communities. By providing a safe source of liquidity to banks, banks are, in turn, able to provide credit for housing finance and community and economic development. As a community partner, FHLB invests 10 percent of its annual earnings in low-income housing initiatives and provides discounted advances for targeted low-income housing or economic development. FHLB has also established a voluntary program to assist with natural disaster home reconstruction and provides foreclosure mitigation and emergency repair and accessibility rehab for special needs and elderly populations.

Additionally, the FHLB has been a tremendous partner of the TBA over the years. FHLB provides the association educational tools and resources to advance our mission of providing top-quality educational programs to our member banks.



Without the services and support provided by the FHLB, Tennessee banks, their customers and communities as well as TBA would suffer. I strongly encourage you to maintain the current structure of the FHLB System. It is proven, it is strong, and it is reliable.

Thank you for the opportunity to comment.

Colin Barrett
CEO and President
Tennessee Bankers Association