

The Honorable Sandra Thompson
Director, Federal Housing Finance Agency
400 7th Street, SW
Washington, DC 20024

Dear Director Thompson:

We write to you as representatives of the banking and credit union trade associations located in the Federal Home Loan Bank of Dallas (FHLB Dallas) District of Arkansas, Louisiana, Mississippi, New Mexico and Texas. Thank you for the opportunity to submit comments in response to the Federal Housing Finance Agency's (FHFA) review of the Federal Home Loan Bank System (FHLB System).

Our trade associations stand united in support of FHLB Dallas and the broader FHLB System. FHLB Dallas gives our members access to reliable liquidity and other critically important services. This, in turn, enables community banks and credit unions to remain viable in a constantly shifting marketplace.

With FHLB Dallas membership, our members also gain access to affordable housing and small business grant programs, a secondary market program, and other important services such as safekeeping. These combine to help our members better meet the needs of the communities they serve.

We also appreciate FHLB Dallas' disciplined underwriting practices, which promote responsible lending. Such adherence to strict risk management practices – combined with the self-capitalizing, cooperative structure of the FHLBanks and the rigorous oversight of FHFA – ensures a strong and viable FHLB System for decades to come.

The regional nature of the FHLB System is also very important to our members. FHLB Dallas' in-house experts truly understand the unique needs of our five-state region. In turn, our FHLBank provides member institutions with custom-made products and services. FHLB Dallas has also been instrumental in offering grant programs tailored to our region's susceptibility to hurricanes, wildfires and other natural disasters.

As you know, credit unions have a directive to serve targeted communities. And FHLB Dallas has made that mission easier by offering affordable housing, community investment and economic development programs that benefit our constituents.

Commercial banks and thrifts must comply with Community Reinvestment Act (CRA) requirements. FHLB Dallas has been instrumental in helping these lenders go above and beyond mere CRA compliance by offering programs that focus on small businesses, as well as low- and moderate-income households.

In conclusion, we thank FHFA Director Thompson for recognizing that the FHLBanks have played a vital role for more than 90 years in providing communities with access to affordable mortgage credit and related services. And we applaud the FHFA for hosting a listening tour as it contemplates ways to improve the FHLB System. As the FHFA moves forward, we would urge caution in considering any widespread changes to the FHLBanks that could adversely impact the stability and effectiveness of the overall system. On behalf of the nearly 730 banks and credit unions that are members of FHLB Dallas, we thank you again for the opportunity to comment, and we look forward to continuing our dialogue with your office in the months to come.

Sincerely,

Chris Moya (Print Name)

President & CEO (Title)

Independent Community Bankers (Institution Name)

 (Authorized Signature)
Chris Moya (Oct 20, 2022 10:10 EDT)

Charles Elliott (Print Name)

President/CEO (Title)

Mississippi Credit Union Associati (Institution Name)

 (Authorized Signature)
Charles Elliott (Oct 19, 2022 12:37 CDT)

Chris Furlow (Print Name)

President & CEO (Title)

Texas Bankers Association (Institution Name)

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Chris Furlow (Oct 20, 2022 10:47 CDT)

Chris Padgett (Print Name)

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Chris Padgett (Oct 19, 2022 17:03 CDT)

Christopher Williston, VI (Print Name)

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Christopher Williston, VI (Oct 21, 2022 13:33 CDT)

Ginger Laurent (Print Name)

CEO (Title)

Louisiana Bankers Association (Institution Name)


Ginger Laurent (Oct 19, 2022 17:52 CDT) (Authorized Signature)

Gordon W. Fellows (Print Name)

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Gordon W. Fellows (Oct 20, 2022 15:37 CDT) (Authorized Signature)

John Anderson (Print Name)

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New Mexico Bankers Association (Institution Name)


John Anderson (Oct 19, 2022 17:05 MDT) (Authorized Signature)

Lorrie Trogden (Print Name)

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Lorrie Trogden (Oct 19, 2022 12:20 CDT) (Authorized Signature)

Matt Rookard (Print Name)

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Louisiana Credit Union League (Institution Name)


Matt Rookard (Oct 19, 2022 12:41 CDT) (Authorized Signature)

Juan Fernandez Ceballos (Print Name)

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Cuanm (Institution Name)


Juan Fernandez Ceballos (Oct 24, 2022 14:31 PDT) (Authorized Signature)

Caroline Willard (Print Name)

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Caroline Willard (Oct 25, 2022 11:44 CDT) (Authorized Signature)