

RuleID	738
RuleNumber	2022-N-11
First Name	Judith
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OrgName	International Bank of Commerce
Comments	<p>The FHLB system gives community banks access to funding that would not otherwise be available to them. The FHLB system acts as an equalizer in giving community banks the opportunity to compete with the global and money market banks that have full access to world financial markets. The FHLB levels the playing field, allowing community banks to compete by supporting the critical funding needed by community banks in good times and especially in difficult times when funding is extremely difficult to find or not available to community banks. Without this critical back stop and support, many more community banks will fail.</p>
CommentDate	10/18/2022
Approver Comments	