



Alfred M. Pollard, General Counsel  
Attention: Comments/RIN 2590-AA39  
Federal Housing Finance Agency – Fourth Floor  
1700 G Street, NW  
Washington, D.C. 20552

Re: Advance Notice of Proposed Rulemaking and Request for Comments – Members of  
Federal Home Loan Banks (RIN 2590-AA39)

Dear Mr. Pollard:

The Federal Housing Finance Agency (FHFA) has requested comments on an advance notice of proposed rulemaking (ANPR) to aid in the review of the nexus between Federal Home Loan Bank membership requirements and the FHLBs' housing finance and community development mission. Following are our views on the ANPR.

FORUM Credit Union has benefited from its membership to the Federal Home Loan Bank of Indianapolis (FHLBI). The relationship began in late 1999 with both our members and financial results being affected positively. FORUM has used over \$56 million of FHLBI's Community Investment Program (CIP) program funding since 2003 – nearly \$40 million to fund low to moderate income mortgages and another \$16 million for a major job creation project in Hamilton County, Indiana.

We are concerned with the possible narrowing of membership eligibility into FHLBs. We have read and concur with the independent analysis by Winston & Straw, which concluded the ANPR would fundamentally change the FHLB relationship, eliminate many financial institutions from membership eligibility, "chill" new member applications, and encourage some to withdraw from membership. If the primary task of regulatory agencies is to implement Congressional directives, why is the FHFA attempting to create them at this time?

The ANPR seems to contradict Congressional tendency over the past quarter century to broaden the field of FHLB membership. During this period, Congress has had many opportunities to clarify and tighten membership requirements if it believed the intent of the Federal Home Loan Bank Act was not being followed. However, Congress has not done so.

It is our belief the ANPR fails to provide compelling reasons for revising membership regulations. The ANPR does not cite any specific abuses of FHLB membership regulations. It is also our understanding the FHFA has not previously provided examples of such problems in its annual reports to Congress. Why are sweeping changes to the current rules needed?

For these reasons, we respectfully request that the ANPR be withdrawn from consideration. Thank you for considering these comments.

Very truly yours,

A handwritten signature in black ink that reads 'Jeff Welch'.

Jeff Welch  
CFO, FORUM Credit Union  
Fishers, IN