

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:

All 12 members of the Federal Home Loan Bank of Topeka's Affordable Housing Advisory Council (AHAC) thank you for the opportunity to comment on the Federal Housing Finance Agency's (FHFA) Advance Notice of Proposed Rulemaking (ANPR) on membership.

The FHFA is considering requiring FHLBank members to satisfy membership requirements not currently set forth in the Federal Home Loan Bank Act or implementing regulations.

The regulatory changes the FHFA is considering would make it more difficult for many financial institutions to remain FHLBank members. Any regulatory measure which constricts FHLBank membership would likely reduce the amount of dollars available to fund critical housing and community development-related projects under the System's Affordable Housing Program (AHP).

The proposed changes would also discourage potential members from joining, inhibiting the ability of FHLBanks to serve the housing and community development needs of their districts. The suggested changes would prove burdensome to small and medium sized member financial institutions – those institutions that make up over 92% of the Federal Home Loan Bank of Topeka's customer base – who are vital housing and community development partners to non-profits in the 10<sup>th</sup> FHLBank District. These proposed changes would not only limit FHLBank membership but also put a chill on the nation's housing and economic recovery.

The ANPR fails to provide any compelling reason for imposing stricter membership regulations, and it does not present any information showing that there is a problem with current membership rules. The ANPR also fails to cite a benefit it hopes to achieve by changing membership rules. Additionally, the FHFA's annual report to Congress on the state of the FHLBanks did not note any problems with the implementation of these rules.

Any changes to the FHLBanks' membership or mission – especially changes that could negatively impact the System's AHP – should come first from Congress, particularly at a time when Congress and the Administration are beginning to examine the issues of affordable housing, community development and the future of housing finance.

Given the affordable housing and community development-related challenges faced by Colorado, Kansas, Nebraska and Oklahoma, the Affordable Housing Advisory Council of the Federal Home Loan Bank of Topeka respectfully requests that the ANPR be withdrawn from consideration. Thank you for considering these comments.

Sincerely,

Roger Nadrchal, Chair  
Andrew L. Bias  
Vicky Dayton  
Dennis W. Lauver  
Michael Reis  
Joe Rowan

William A. Major, Vice Chair  
Becky Christoffersen  
David W. Herlinger  
Timothy T. O'Connor  
Michael Renken  
Dena Sherrill