



February 17, 2010

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 Louisiana Bankers Association is pleased to respond to the Federal Housing Finance Agency's request for public comment on an advanced notice of proposed rulemaking regarding Federal Home Loan Bank (FHLB) membership. We submit the following comments on behalf our member banks and thrifts that rely on the Federal Home Loan Bank of Dallas for stable, lower-cost funding to meet the capital and credit needs of their communities.

In our view, restricting membership eligibility runs counter to the core mission of the FHLB System to help finance homes, jobs, small businesses, local infrastructure and affordable housing in communities across America and in our state. The FHLB System has been a crucial funding source for our financial institutions, particularly during periods of credit contraction. Restricting membership now that our economy is gaining strength would be counterproductive.

Furthermore, it's our view that any proposal to change the mission of the FHLB System or alter its membership eligibility should emanate from Congress. In recent years, Congress has had many opportunities to address these questions and has time and again reaffirmed its commitment to strengthening the FHLB System by choosing not to alter its mission or membership criteria.

I urge you to withdraw the proposed rule.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert T. Taylor".

Robert T. Taylor
Chief Executive Officer
Louisiana Bankers Association