

March 21, 2011

Alfred M. Pollard
General Counsel
Attention: Comments/RIN 2590-AA39
1700 G. Street, NW
Washington, DC 20552

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

Dear Mr. Pollard:

Thank you for the opportunity to comment on the advance notice of proposed rulemaking regarding requirements for prospective and existing members of the Federal Home Loan Banks in support of the FHLB housing finance mission. On behalf of Perpetual Federal Savings Bank, I offer the following comments.

My bank is a community financial institution that uses the FHLB to secure public deposits, home loans and manage my balance sheet risk. These programs not only help us to operate more efficiently but also bring significant benefits to the communities we serve.

The success of the FHLBs to provide a stable, reliable source of low-cost funds to community financial institutions, like mine, is dependent on the FHLBs' cooperative structure, serving a diverse membership base. I am concerned that many of the membership restrictions you pose in a series of questions overlook the FHLBs' basic business model as well as the legislative history of the FHLB membership.

The FHLB System is collateral based. In order to borrow, my institution must pledge eligible collateral in excess of the loan ("advance") amount. This collateral must adhere to strict underwriting guidelines and is generally comprised of mortgage loans. Absent this source of collateral, advances wouldn't be extended to my institution. As a result of this self-regulating business formula, the FHLB has never experienced a loan loss on its advances, and members have a strong incentive to make high quality loans and investments with FHLB advances, whether for a home or auto purchase, small business needs, or other investment in the community. An artificial, ongoing 10 percent requirement is unnecessary and burdensome to the FHLB as well as to the individual member who will already be barred from advances absent sufficient collateral.

Similar concerns arise with the proposed application of various standards and thresholds of mortgage holdings and home financing policy adherence. If an institution meets the congressionally-established membership criteria, expressly expanded over time to include commercial banks, credit unions and community development financial institutions, absent evidence that the current mechanism is flawed, these proposed changes appear burdensome and counter to Congressional and Administrative intent to reduce unnecessary or duplicative regulation.

Finally, the imposition of sanctions for failure to meet this new range of proposed membership criteria would create uncertainty and instability for members and FHLB management. An institution such as mine depends upon FHLB funding as a stable source of liquidity in all economic cycles, for long-term as well as short-term funding strategies. Continued reliable access to FHLB funding is the best means to ensure long-term funding safety and soundness of the FHLB System and the hundreds of community members it serves.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael R. Melvin". The signature is fluid and cursive, with the first name being the most prominent.

Michael R. Melvin
President
Perpetual Federal Savings Bank
Urbana, OH