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From: Barb Lamphere [mailto:blamphere@twoplusfour.com]

Sent: Wednesday, April 05, 2006 2:25 PM

To: Comments

Cc: Charlie Kaltoff; Nancy Berkowitz

Subject:

I am sending along a few comments on the proposed change in regulations of the Federal Home Loan Bank rules. I think it is a good idea to allow the District Banks to set the priorities for the district rather than having a national set of priorities, which should make for priorities more in keeping with the needs of the member banks of the district.

I also think it is a great idea to incorporate revolving loan funds and housing counselling grants to be eligible activities. Those are activities, which may be very important within certain regions. I think it is great to have that flexibility.

I do feel that FHLB should not have to borrow against future possible profits to support the program, since it is impossible to predict what the profits might be in the future. It would be good though to have a floor, which is the minimum, which would be available each year.

There should also be a priority for member banks, which exist only in one District as opposed to a bank, which covers multiple districts.