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September 5, 2014

The Honorable Melvin L. Watt  
Director  
Federal Housing Finance Agency  
400 Seventh Street, SW  
Washington, D.C. 20024

Re: RIN 2590-AA39 - Notice of Proposed Rulemaking on Members of Federal Home Loan Banks

Dear Mr. Watt:

On behalf of the Nebraska Bankers Association (NBA), I would like to request that the time for submitting comments on the Federal Housing Finance Agency's (FHFA) proposed rule on Members of the Federal Home Loan Banks ("Proposed Rule") be extended. The proposed rule is complex and would result in dramatic changes to longstanding policies and regulations concerning the FHLBanks. Given the significant impact that the proposal is likely to have on NBA members that are existing or potential FHLBank members warrants the granting of additional time for affected parties to comment on the proposed rule.

The extended period of time has elapsed since the FHFA initially published its advance notice of proposed rulemaking on this matter in December 2010. The proposed 90-day comment period provides insufficient time to allow FHLBank stakeholders to fully assess and properly comment on the impact of the proposed rule. Accordingly, we would respectfully request a 60-day extension of the comment period to allow more interested parties time to comment, and provide the FHFA with the broadest possible array of input on this proposal.

On behalf of the NBA, thank you for considering our position on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Baier", is written over a light blue horizontal line.

Richard Baier  
President and CEO

/jsh