



September 16, 2014

The Honorable Melvin L. Watt, Director  
Federal Housing Finance Agency  
400 7th Street, SW  
Washington, DC 20024

Re: RIN 2590-AA39  
Request for Extension of Comment Period Members of Federal Home Loan Bank,  
Notice of Proposed Rulemaking

Dear Director Watt,

I write to you on behalf of the 145 members of the Indiana Bankers Association to request that the comment period for RIN 2590-AA39 be extended from 60 days to 120 days starting September 2, 2014, its day of issue.

The Indiana Bankers Association (IBA) is largely comprised of community banks serving the needs of many rural and some urban areas of the state. Accessibility to Federal Home Loan Bank (FHLB) advances to fund loans and to provide liquidity is of paramount importance to these IBA member institutions. They are concerned that restrictions on membership may result in lower advance availability thus limiting their ability to appropriately fund the housing needs of their communities.

Consequently, IBA believes it will need additional time to analyze the complex changes and determine what results may occur that affect our members and their communities. Thank you for your consideration of our request.

Sincerely,

A handwritten signature in black ink that reads "S. Joe DeHaven". The signature is written in a cursive, flowing style.

S. Joe DeHaven  
President and CEO

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"Every man owes a part of his time and money to the business or industry in which he is engaged.  
No man has a moral right to withhold his support from an organization that is striving to improve conditions within his sphere."  
— President Theodore Roosevelt, 1908