



**Duluth Teachers Credit Union**  
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October 31, 2014

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

Dear Mr. Pollard:

I am writing to comment on the proposed rulemaking regarding membership eligibility in Federal Home Loan Banks put forward by the Federal Housing Finance Agency. The proposed rule creates concern for our credit union.

We rely on FHLB as our main source of liquidity in a time of need. This credit line with FHLB gives us confidence that we will be able to continue to provide lending to our community in varying economic environments.

I believe the FHLB of Des Moines serves as a critical source of liquidity as well for many of our neighboring credit unions in Minnesota. This rule as proposed would cause concern that our credit union or those around us may no longer be able to remain a member of FHLB Des Moines.

We greatly count on the FHLB Des Moines as part of our asset liability management program. We need to continue to have confidence that we will be able to do business with the FHLB in the future. FHLB funding is a huge part of our ability to properly manage our assets or ultimately to stay in business.

We ask that the FHFA withdraw the new membership rules contained in its September 12, 2014 Notice of Proposed Rulemaking because of the possible negative impact on credit and economic growth and financial institution health.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa Herstad".

Lisa Herstad  
Executive Vice President  
Duluth Teachers Credit Union

