



201 Pennsylvania Avenue ↗ Charleston, West Virginia 25302
P.O. Box 6907 ↗ Charleston, West Virginia 25302
Telephone: (304) 340-3000
Fax: (304) 340-3003

October 30, 2014

Alfred M. Pollard, Esq., General Counsel
Attention: Comments/RIN 2590-AA37
Federal Housing Finance Agency, Fourth Floor
400 Seventh Street, S.W.
Washington, DC 20024

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

Dear Mr. Pollard:

On behalf of First Bank of Charleston, Inc., I am writing to express my apprehensions about the subject notice of proposed rulemaking. While we appreciate your apparent desire to provide for a strong Federal Home Loan Bank System that supports housing, we believe the rule undermines the goal of the proposal.

Liquidity provided by the FHLB of Pittsburgh is vital to our bank's overall asset liability management needs. My regulator requires a reliable source of contingent liquidity. For us, this has always been provided by our Pittsburgh Home Loan Bank. With this rule, I'm concerned my regulator will not consider the FHLB's reliable and may require another, more expensive, liquidity source.

As I manage my institution, I manage interest rate risk, credit risk and liquidity risk. I also strive to serve the credit needs of my community. This regulation could put me in a situation where I may not be able to support growing business loan demand because my institution might get too close to the CFI threshold. Based on our belief that the proposals could harm FHLBank members and generally weaken a System that has worked well for more than 80 years, we ask that the FHFA withdraw the September 12, 2014 Notice of Proposed Rulemaking.

Sincerely,

Tony Marks
President & C.E.O.
First Bank of Charleston, Inc.

