Mr. Alfred M. Pollard, General Counsel

Attention: Comments/RIN 2590-4A39

Federal Housing Finance Agency

400 Seventh Street SW

Washington, D.C. 20024

Re: Notice of Proposed Rulemaking and Request for Comments – Members of the FHLBanks (RrN 2590-AA39)

Dear Mr. Pollard:

I am the President/CEO of the Bank of St. Elizabeth. Our bank provides primarily residential mortgages to our trade area in Central Missouri. The proposal above raises many concerns for our Bank and the communities that we serve.

We have been a member of the FHLB system for several years and believe that it will have a very negative impact on housing finance and the economy as a whole. The liquidity that the FHLB system provides is a very important part of the providing financing in the housing sector, especially for the smaller banks and the more rural areas that have fewer resources to draw on. Having been a former regulator myself, I can appreciate FHFA wanting to protect the FHLB system, however, I cannot figure out why the FHFA is proposing to limit liquidity to the FHLB membership when no apparent problems exist. The FHLB system has successfully shown the ability to provide liquidity and funding for housing and community development, which we need now more than ever to get the economy growing. We believe that the above proposal will have the opposite effect than intended, as there are fewer members, there will be fewer advances, less liquidity and funding available to the community, resulting in a smaller and weaker FHLB system in a weaker economy.

Again, being a former bank regulator, I believe the best avenue is to let the Federal Home Loan Banks continue to manage themselves under reasonable and prudent regulatory oversight. If problems in the management of the Banks warrants, you should use your regulatory examination processes to address the concerns at that time. With that in mind, please withdraw the above proposal. Thanks you for your consideration of our comments.

Yours truly,

Brice A. Luetkemeyer

President/CEO