

November 6, 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:

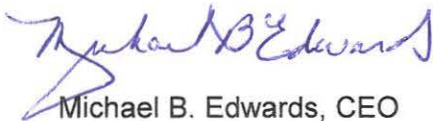
On behalf of Marquette Savings Bank, I am writing to express my concerns about the notice of proposed rulemaking. While we appreciate your apparent desire to provide for a strong Federal Home Loan Bank System that supports housing, we believe the rule undermines the goal of the proposal.

Contingent liquidity sources have been a focal point of my regulators in recent examinations. For Marquette, the FHLB of Pittsburgh is our primary liquidity source. With this rule, I'm concerned my regulator will not consider the FHLBanks reliable and may require another, more expensive, liquidity source.

Additionally, Congress has a record of expanding membership opportunities (1989, 1998, 2008) not restricting them. I believe expanded membership has strengthened the FHLB System. This rule diminishes community investment programs that help communities grow and thrive by diminishing the strength of the FHLBanks.

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, reconsider) the September 12, 2014 Notice of Proposed Rulemaking.

Respectfully,



Michael B. Edwards, CEO
Marquette Savings Bank
920 Peach St.
Erie Pa, 16501

