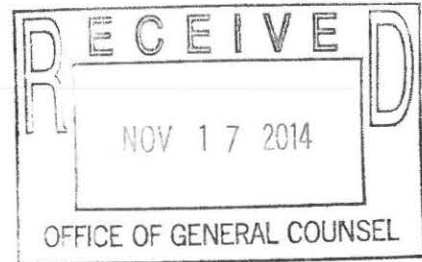




Bank Iowa.



November 5, 2014

Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA39
Federal Housing Finance Agency
400 Seventh Street SW
Washington, D.C. 20024

Re: Notice of Proposed Rulemaking/Request for Comments- Members of the FHLBanks (RIN 2590-AA39)

Dear Mr. Pollard:

I am Darlene Carlson, CFO of Bank Iowa, headquartered in West Des Moines, IA. Our institution is a \$1.1B financial institution with 24 offices in 21 communities throughout Iowa. We provide lending options in all areas: Commercial, Ag, Consumer, Real Estate and lines of credit. We have been serving customers and clients for nearly 100 years.

I am writing to express my concerns about the notice of proposed rulemaking regarding membership eligibility in Federal Home Loan Bank (FHLBanks) put forward by the Federal Housing Finance Agency (FHFA). The proposed rule includes significant and unnecessary changes to long-standing membership rules for the FHLBank system. The proposed changes are inconsistent with Congressional intent and the Federal Home Loan Bank Act (FHLBank Act). For these reasons Bank Iowa strongly opposes this proposed rule.

The proposed regulation on FHLB membership creates many concerns for our bank. While my bank would meet the proposed rule requirements today, I feel that the rule establishes a problematic precedent. There remains a distinct chance that at some point in the future, due to prudent management of interest rate risk, as well as economic or regulatory changes, our institution could fail the test and be removed from eligibility of FHLB membership.

Our membership and utilization of the products offered through FHLB Des Moines has proven to be a reliable and competitive source of liquidity for all of our financing needs in all economic environments. This rule, if adopted, would remove that certainty. Additionally, having a credit line and borrowing capacity with FHLB Des Moines promotes the safe and sound management of our institution.

Because the proposals would harm FHLBank members and hurt housing, credit and economic growth, we ask that the FHFA withdraw membership rules contained in its September 12, 2014 Notice of Proposed Rulemaking and work with FHLB members to preserve the FHLBs as a reliable partner that benefits local lending institutions, communities, housing, homeownership and the nation's economy.

Sincerely,

Darlene Carlson
CFO