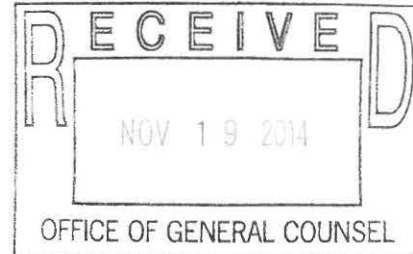


Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA39
Federal Housing Finance Agency
400 Seventh Street SW
Washington, D.C. 20024



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

Dear Mr. Pollard:

I am Rodney Veatch, Vice President of Success Bank. Our institution provides lending across all of our community with a focus on commercial, agricultural, consumer, rural consumer mortgages, and/or simply all of the credit needs in our community. Success Bank uses FHLBDM as form of liquidity, which in turn allows us to meet the loan demand in a small rural community. Without the ability to use FHLBDM for a form of liquidity we would be turning away potential new businesses, young farmers, and consumers for a lack of funding to meet our loan demand. We are currently a \$130,000,000 plus in total assets, with three locations in rural Iowa with 26 employees and without us our communities would struggle.

The proposed regulation on FHLB membership creates many concerns for our bank. While my bank would meet the proposed rule requirements of the proposed rule today, I feel that the rule establishes a problematic precedent.

It is also crucial to point out that more than 25 years ago, Congress made it clear that community financial institutions (CFIs) such as my bank could use advances for purposes other than residential housing finance. It remains the intent of Congress today that CFIs may utilize FHLBank liquidity for commercial real estate, small business, agricultural real estate and agricultural operating loans. This fact alone highlights how this proposed rule runs counter to existing federal statute.

Broadly speaking, the FHLB Des Moines serves as a critical source of liquidity for financial institutions in Iowa, Minnesota, Missouri, North and South Dakota. They have proven to be a reliable and competitive source of liquidity for all of our financing needs in a variety of economic environments. This rule, if adopted, would remove the certainty that the FHLB Des Moines can be counted on to be a reliable source of liquidity in all market conditions.

The on-going mortgage asset test requirements will artificially distort balance sheet management practices, decreasing the flexibility of community banks, credit unions and insurance companies to manage their balance sheets in response to changing market conditions.

Your agency's proposed rules could fundamentally change how, or even whether, a depository financial institution such as ours could remain a member of a FHLB Des Moines. This is enormously disturbing. Confidence, trust, and reliability comprise the bedrock upon



MAIN OFFICE 109 NORTH MADISON • BLOOMFIELD, IA 52537 • 641-664-2006

BRANCH OFFICES MOULTON 641-642-3219 MILTON 641-656-4085

www.successbank.net

which our long-time FHLB membership is built. We need to know that the FHLB Des Moines can provide funding on a moment's notice as it did in the recent financial crisis.

It also seems incredibly disingenuous to eliminate captive insurance companies from FHLB membership at a time when housing finance is at risk with only a small private secondary market and Fannie and Freddie in conservatorship. This is the time to encourage the development of additional markets for both single and multifamily mortgages. Financial institutions are being discouraged from holding mortgages meaning that we need to see the development of new outlets. The FHLBs are a logical place to create these new models. As a credit union we need the FHLB as a trusted partner to help us develop these new markets. Why would you eliminate opportunities, rather than work with us to develop new systems of finance?

Because the proposals would harm FHLB members and hurt housing, credit and economic growth, we ask that the FHFA withdraw the new 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 of its members that benefits local lending institutions, communities, housing, homeownership and the nation's economy.

Without access to our FHLB, the credit available to communities in our region will be unnecessarily impacted. We believe this proposed rule is a solution in search of a problem. Because the proposed rule outlines no safety and soundness concerns-and because there is no legitimate public policy goal of the proposed rule- Success Bank strongly recommends that you withdraw the proposed rule. Thank you for taking our comments into consideration.

Sincerely,

Rodney D Veatch
Vice President



veatch@successbank.net

phone/fax 641.664.7174