



Opening Doors • Transforming Lives.

November 24, 2014

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

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

Mr. Pollard:

On behalf of Community Housing Network, Inc. (CHN), I am writing to request that the FHFA withdraw the Notice of Proposed Rulemaking – Members of Federal Home Loan Banks, based on its potential to negatively impact the development of affordable housing opportunities in our service area and nationwide.

CHN is a nonprofit organization whose mission is to provide homes for people in need and to create sustainable communities. We provide affordable housing and housing resources to people who are homeless or at risk of homelessness, people with disabilities and other vulnerable members of the Southeast Michigan community. Our mission is closely aligned with the original mission and intent of the Federal Home Loan Bank system, and when we access funds through the FHLB Affordable Housing Program (AHP) we continue advancing both missions.

Over the past 13 years, CHN has utilized over \$2 million in AHP funds from the FHLBanks of Indianapolis and Cincinnati to develop 182 units of housing. This has included creating homeownership opportunities, providing down payment assistance, preserving affordable housing, and constructing new affordable rental housing. Most recently, CHN received \$380,000 in AHP funding in FY 2014, which will be leveraged with Michigan State Housing Development Authority Low Income Housing Tax Credits to develop 48 units of new construction, mixed-income rental housing, including 12 units set aside as supportive housing for families with special needs.

As a direct result of AHP funding, CHN is able to provide housing for individuals and families who would otherwise be homeless due to the serious lack of




affordable housing and the high rent burden in our community. CHN has also been able to preserve numerous units of housing, making them affordable and accessible so individuals with disabilities can access housing that meets their individual needs. The activities made possible with AHP funds positively impact both the stability of the individual residents and their neighborhoods.

As you know, by law, the amount of funds available through the AHP is directly correlated to the profits of the FHLBanks. If the FHFA adopts the proposed rule excluding captive insurers from membership and preventing entities not eligible for membership from gaining access to Bank advances through a captive insurer, FHLBank profits from lending activity will be reduced, thereby decreasing the amount of funds available for the AHP. Particularly in this time of scarce resource, effectively reducing the amount of AHP funds available by excluding captive insurers from membership will erode our ability to improve lives and communities through affordable housing development.

To protect the Affordable Housing Program and the individuals and communities so greatly benefited by it, Community Housing Network, Inc. respectfully requests that the FHFA withdraw the proposed rule.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marc Craig". The signature is fluid and cursive, with a large loop at the end.

Marc Craig  
President