

# AndroscogginBank

November 25, 2014

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

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

Dear Mr. Pollard:

The Federal Housing Finance Agency has requested comments on a notice of proposed rulemaking on Federal Home Loan Bank membership requirements. As a director and former president and CEO of Androscoggin Savings Bank and as vice chairman of the FHLB Boston board, I appreciate the opportunity to submit this comment on the proposed rule.

As proposed by the FHFA, ongoing compliance with membership requirements would impose additional regulatory burdens on FHLBank members and add an element of uncertainty to FHLBank membership. Members would be required to manage their balance sheets to make certain they have ample assets to meet the proposed membership requirements to ensure access to FHLBank funding products. In short, the proposal would effectively mandate a member's asset allocation.

I wish to emphasize how important reliable access to FHLB Boston is to all of its financial institution members. Androscoggin Savings Bank has \$79 million in advances outstanding as of September 30. The proposed rule, while not affecting us today, would cause us great concern about the long term reliability of FHLB advances. This would be a risk to our bank since we rely on the FHLB Boston to help us manage interest-rate risk and provide just-in-time liquidity access.

In addition to supplying products to meet its members' liquidity needs, the FHLBanks are an important source of funding for low- and moderate-income housing in the country. The Affordable Housing Program is funded by 10 percent of each FHLBank's net profits annually. Maine-based FHLB Boston members have been awarded more than \$50.7 million in total subsidies and subsidized advances to create or preserve more than 3,140 affordable rental and ownership units. These numbers are critical to our largely rural state, with its older housing stock. The adverse impact the proposed rule would have on the FHLB Boston's ability to grow and even maintain existing levels of advances would directly lead to reduced funding of the AHP, and in turn, fewer safe, decent and affordable housing options for Maine communities.



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The FHLBank's cooperative structure works because it is dependent on a diverse membership. Limiting that membership with the changes proposed in the rule would weaken that structure which will affect the ability of the Boston bank to reliably and safely serve its membership. This business model has been a success for more than 80 years and must stay strong and stable so that the financial recovery can continue.

Lastly, in my role as a vice chairman of the FHLB Boston, I am particularly proud of the time and effort the Bank has spent over the years ensuring that our member regulators are well-informed and educated about the Bank. I am very concerned that the proposed rule would create more uncertainty and unnecessary concern on the part of the regulators.

For these reasons, I request that the proposed rule be withdrawn. Thank you for the opportunity to submit a comment.

Sincerely,

A handwritten signature in cursive script that reads "SA Closson".

Steven A. Closson  
Director, Androscoggin Savings Bank  
Vice Chairman, FHLB Boston Board of Directors