

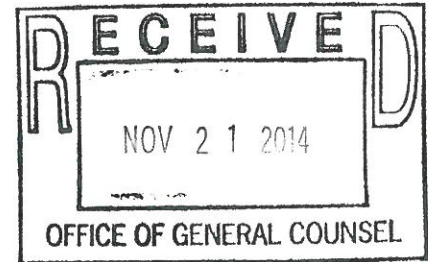


# Prudential Savings Bank

1834 West Oregon Avenue, Philadelphia, PA 19145-4725 215-755-1500

November 14, 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)**

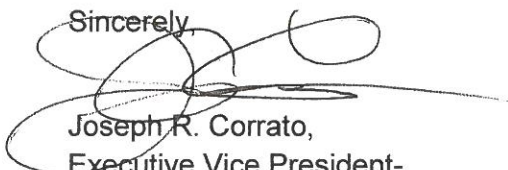
Dear Mr. Pollard:

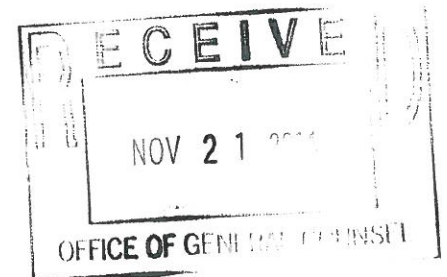
On behalf of the Board of Directors and Officers of Prudential Savings Bank, I am writing to express my deep concerns about the notice of proposed rulemaking. While we appreciate your apparent desire to provide for a strong Federal Home Loan Bank System that supports housing, we believe that the rule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

We're a Community Financial Institution who meets the 1 percent test easily – but, as a Chief Financial Officer and Bank Director operating in a very uncertain economic environment, and an increasingly regulated industry, I'm worried that any future plans to merge or be acquired would be halted by this rule because I'll have to factor in the 10 percent tests. I sincerely believe that this will stunt growth plans for community banks.

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 reconsider the implications of the September 12, 2014 Notice of Proposed Rulemaking and withdraw it.

Sincerely,

  
Joseph R. Corrato,  
Executive Vice President-  
Chief Financial Officer-  
Director



OTHER PRUDENTIAL OFFICES (215) 755-1500

Member FDIC

2101 SOUTH 19TH STREET, PHILADELPHIA, PA 19145-3709  
112 SOUTH 19TH STREET, PHILADELPHIA, PA 19103-4629  
238 A MOORE STREET, PHILADELPHIA, PA 19148-1925  
www.prudentialsavingsbank.com

1722 SOUTH BROAD STREET, PHILADELPHIA, PA 19145-2315  
28 NORTH 3RD STREET, PHILADELPHIA, PA 19106-2113  
601 MORGAN AVENUE, DREXEL HILL, PA 19026-3105 610-259-8100  
Bank by Phone/Rate Line 215-755-1505

