



November 17, 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 Main Street Bank Corp, we are writing to express our thoughts regarding 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 the rule undermines the goal of the proposal.

Our regulator requires a reliable source of contingent liquidity. For us, this has always been our Federal Home Loan Bank. With this rule, we're concerned our regulator will not consider the FHLBanks reliable and may require another, more expensive, liquidity source.

It seems this rule has the potential to restrict access to liquidity at the exact point in time when more, not less, liquidity is needed in a recovering market. While many depository institutions are flush with deposits at the current time, most observers believe that this may change when interest rates inevitably rise.

As a small community bank it's tough enough to do business already. This rule would add uncertainty of going over and thus being subject to the 10 percent test. This seems like an arbitrary and unnecessary imposition of regulation that will affect our strategic business decisions. We are very confident that we can manage our portfolio as we manage interest rate risk, market risks and the other attendant risks.



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 withdraw the September 12, 2014 Notice of Proposed Rulemaking.

Respectfully yours:

A handwritten signature in blue ink, appearing to read "Robert M. Furka". The signature is written in a cursive style with a large initial "R" and "F".

Robert M. Furka, Chief Financial Officer
Main Street Bank Corp.
2001 Main Street, Suite 100
Wheeling, WV 26003