



**Agents National Title  
Insurance Company**  
*Agents Only. Agents First.*

December 8, 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 Agents National Title Insurance Company (ANTIC), we are writing to express our concerns about the notice of proposed rulemaking. We believe the rule undermines the goal to provide for a strong Federal Home Loan Bank System that supports housing.

As a member of the FHLB Des Moines there are many ways a member of the Bank supports housing. The housing market depends upon the most efficient land conveyance system in the world to accurately record transactions that occur between buyers, sellers and lenders. It is the job of the title company (i.e., title abstractor or attorney) to interact with the parties to ensure marketable title is conveyed in a real estate transaction.

ANTIC is a title insurance underwriter serving several states in the Midwest through independent title agents. ANTIC is focused on the residential market with 88% of the policies issued coming from residential closings.

The value of ANTIC as a member of the Bank is not measured by a percentage of its assets but by its place in the residential market place. ANTIC values its membership with the FHLB Des Moines as a source of liquidity for our title business supporting local community banks which work hand in hand with our agents.

It is our belief that the proposals could harm FHL Bank members and 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.

We had a great discussion with you in Palm Beach at the 2013 ALTA Convention in regard to HUD and the FHA. We appreciate your willingness to work with the title insurance industry to protect consumers and promote housing. We would ask that you include us in your decision making in forming rules to reform the FHLB.

Respectfully,

Brent J. Scheer, CPA  
CFO/COO & Treasurer

David A. Townsend, ESQ., NTP  
CEO & President