## WOOD & HUSTON BANK

27 E. North Street Marshall MO, 65340 (660) 886-6825

December 10, 2014

Mr. Alfred M. Pollard, General Counsel Attn: 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 FHLBs (RIN 2590-AA39)

## Dear Mr. Pollard:

As President and CEO of Wood & Huston Bank, I am writing to express my concerns about the above referenced notice of proposed rulemaking. One of my main concerns is the potential for this rule to restrict access to liquidity. What good purpose would that serve? Can you imagine the consequences such a rule might have had during the recent financial crisis?

There are several other reasons why I am concerned about this proposed rule, not the least of which is the potential to reduce FHLBanks income, which will shrink available money for affordable housing grants that are so vital to our communities. My bank has participated in these grants with FHLB on more than occasion.

While I am sure that the FHFA's intentions are honorable, I believe the proposed rule is attempting to fix a problem that doesn't exist, and will slow economic growth through the weakening of the FHLBank system, a system that has worked well for over 80 years.

I respectfully request that the FHFA withdraw this Notice of Proposed Rulemaking. Thank you for your consideration.

Sincerely,

Bay B. Roudelph
Barry R. Randolph
President and CEO