



December 12, 2014

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

Re: Notice of Proposed Rulemaking and Request for Comments- Members of the FHLBanks (RIN 2590-AA39)

Dear Mr. Pollard:

I am writing to express my disapproval of the proposed rulemaking regarding membership eligibility in Federal Home Loan Bank (FHLBanks) put forward by the Federal Housing Finance Agency (FHFA). The proposed rule includes significant and unnecessary changes to long-standing membership rules for the FHLBank system. The proposed changes are inconsistent with Congressional intent and the Federal Home Loan Bank Act (FHLBank Act). For these reasons our bank opposes this proposed rule.

I've served as president of the Bank of Advance, Missouri since 1992. The primary loan type we make is for one-to-four family residential real estate. We also make a significant amount of ag and small business loans. The FHLB has been a key source of liquidity required to fund ag production loans and for providing us with longer term, fixed rate advances, primarily to fund home loans. We are currently at 94% loan to deposit so it's vital to our bank to have access to a reliable, fairly priced funding source such as FHLB. Our bank has been serving rural southeast Missouri since 1902. We have over \$300 million in assets, employ over 80 people and have 6 branches.

Your agency's proposed rules could fundamentally change how, or even whether, a depository financial institution such as ours could remain a member of a FHLB Des Moines. This is enormously disturbing. We need to know that the FHLB Des Moines can provide funding on a moment's notice as it did in the recent financial crisis.

Because the proposals would harm FHLBank members and hurt housing, credit and economic growth, we ask that the FHFA withdraw the new membership rules contained in its September 12, 2014 Notice of Proposed Rulemaking and work with FHLB members to preserve the FHLBs as a reliable partner of its members that benefits local lending institutions, communities, housing, homeownership and the nation's economy.

Main Bank
P.O. Box 400
Advance, MO 63730-0400
573-722-3517
Fax: 573-722-3527

Lending Center
P.O. Box 400
Advance, MO 63730-0400
573-722-3518
Fax: 573-722-2500

Bell City Facility
P.O. Box 163
Bell City, MO 63735-0163
573-733-4341
Fax: 573-733-4252

Chaffee Banking Center
P.O. Box 7
Chaffee, MO 63740
573-887-3551
Fax: 573-887-6008

Dexter Banking Center
P.O. Box 829
Dexter, MO 63841-0829
573-624-1500
Fax: 573-624-3909

Lerna Banking Center
P.O. Box 99
Lerna, IL 62440
217-234-9200
Fax: 217-234-7125

Bowen Banking Center
P.O. Box 215
Bowen, IL 62316
217-842-5234
Fax: 217-842-5232

I ask that you withdraw the proposed rule. Thank you for taking our comments into consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Harold M. Miles". The signature is written in a cursive, flowing style with a large initial "H".

Harold M. Miles, President

Bank of Advance