

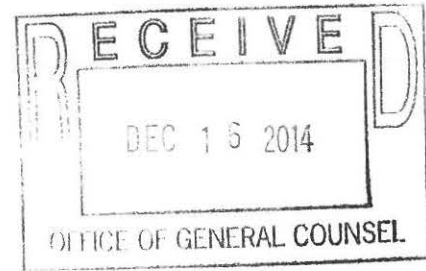


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November 24, 2014

Alfred M. Pollard, General Counsel  
Attention: 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 Federal Home Loan Banks (RIN 2590-AA39)**

Dear Mr. Pollard:

As an affordable housing partner that works closely with developers and FHLBank Pittsburgh, we have observed firsthand the important role that the FHLBank plays in providing funding for affordable housing. The proposed asset test rule will greatly affect the relationship between FHLBanks and their member banks and adversely impact affordable housing development in Philadelphia.

Since 1990, FHLBank Pittsburgh has provided approximately \$183 million in AHP grant awards that have created more than 28,000 units of housing for low or very low-income residents. The majority of affordable housing transactions in the City of Philadelphia are assisted with AHP funds as a gap financing tool. As federal sources at the local level like Community Development Block Grant and Home Investment Partnership funds dwindle, gap financing sources like AHP are increasingly important. By creating more barriers to membership, FHLBank Pittsburgh's ability to provide AHP grants to affordable housing partners will be diminished in a time where it's needed most. In short, FHLBank Pittsburgh will have fewer funds available to provide AHP grants to support very-low and low-income housing.

We may not be FHLBank stockholders, but we are *stakeholders*. The neighborhoods we serve require access to credit to build new housing, rehab existing stock and stimulate community investment. An arbitrary asset test for continued FHLBank membership will achieve the opposite effect. Our relationship with vulnerable populations with urgent needs for safe and affordable housing leads us to conclude that restricting the continued access of banks and credit unions to FHLBank membership will hurt communities.

The Philadelphia Redevelopment Authority strongly urges FHFA to withdraw RIN 2590-AA39.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian Abernathy".

Brian Abernathy  
Executive Director