



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:

Our institution serves the needs of our rural customers in northern Missouri and many in the Kansas City metro area. We have roughly \$900 million in assets. We work hard to serve the needs of our customers and are very concerned about the health and welfare of individuals and businesses in the area that we serve. We are writing to state our opposition to the proposed rulemaking indicated above.

The Federal Home Loan Bank of Des Moines provides us an important source of liquidity. We would be opposed to any regulation that would weaken the reliability of this relationship and in turn hinder our ability to serve our community.

This proposed rulemaking would add unnecessary regulatory burden to our organization. We feel very strongly about serving the needs of our customer base. We take an active role in understanding and serving many aspects of our customers' financial needs. While this proposed rulemaking may be intended to encourage that housing needs are met, we feel that this regulation would impose additional burden that could be a distraction from rather than an incentive to serve these housing needs.

The effect of this rulemaking, if successful, would impose limits on how we may be able to structure our balance sheet and manage our risks in the future. As such we ask that you reconsider the pursuit of this proposed rulemaking.

Thank you very much for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jon Appleby", is written over the typed name.

Jon Appleby
CFO
Citizens Bank and Trust Company
Chillicothe, Missouri