



December 18, 2014

Mr. Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA39
Federal Housing Finance Agency – Fourth Floor
1700 G Street, NW
Washington, D.C. 20552

Re: Notice of Proposed Rulemaking and Request for Comments – Members of Federal Home Loan Banks (RIN 2590-AA39)

Dear Mr. Pollard:

ChoiceOne Bank appreciates the opportunity to submit comment on the Federal Housing Finance Agency's (FHFA) proposed rule changes to the Federal Home Loan Bank (FHLB) system and membership requirements. We respectfully ask that the FHFA withdraw the proposed rule from consideration.

We are a \$540 million community bank headquartered in Sparta, MI with roots in the area since 1898. The bank provides a full range of services to our community covering four counties in Michigan. As a member of a FHLB, we rely on heavily on the FHLB for liquidity to support our mission in the community to deliver needed credit and funding to our customers. We are also participants in the FHLB Mortgage Purchase Program (MPP), which provides us the ability to meet customer needs.

While ChoiceOne Bank can currently meet both the proposed 1% and 10% tests, the regulatory burden on all members as well the loss of current members that cannot meet the proposed requirements, negatively impacts all members' ability to service customers. The loss of members will most certainly reduce FHLB availability as a primary source of liquidity to the members. We feel these changes would inhibit local economic growth, impact local housing markets, and reduce the funding available for the Affordable Housing Program.

To reiterate, we thank you for the ability to comment on the proposed rules on the FHLB and reverently ask that the NPR be withdrawn.

Sincerely,

A handwritten signature in black ink, appearing to read "James Bosserd", is written over a large, thin, vertical line that extends from the signature down towards the typed name below.

James Bosserd
President and CEO
ChoiceOne Bank

www.choiceone.com

109 East Division Street, P.O. Box 186, Sparta, MI 49345 / tel 888.775.6687 / fax 616.887.7990