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12 December, 2014

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

Subject: Proposed Rulemaking Comments – FHLB Membership Requirements (RIN 2590-AA39)

Dear Mr. Pollard,

The purpose of this letter is to convey my concern about the above subject proposed rule. After reviewing the proposed rule, I believe it to be mostly about personal preferences and opinion. I cannot see how the proposed rule will improve the system's safety-and-soundness, earnings at risk, or overall financial position. In fact, it could very well have an adverse impact by reducing membership and subjecting membership to ongoing analysis that could change again at any time.

First National Bank, Scott City, Kansas, is located in rural western Kansas in a town with a population of about 3,500. We deeply value our relationship with the Topeka FHLB and extensively use their MPF program for the benefit of our community. While we would currently pass the proposed changes, I am concerned that at some future time we may not be able to pass it. As I understand it, we wouldn't get credit under the proposed rule for mortgages we originate and sell to the FHLB.

In conclusion, I see no particular advancement of the public's interest in the proposed rule and strongly request that it be rescinded.

Sincerely yours,

Skip Numrich, President

