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## Community State Bank of Missouri

**WILLIAM C. McILROY**  
*President*

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*Exec. Vice President/Co-CEO*

**MARK A. GOODIN**  
*Exec. Vice President/Co-CEO*

**JOHN M. McILROY JR.**  
*Chairman of the Board*

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 concerns about the notice of 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 Community State Bank of Missouri opposes this proposed rule.

I am Mark A. Goodin, Co-CEO and Executive Vice President of Community State Bank of Missouri. I am also the Chairman Elect of the Missouri Bankers Association. Our institution provides lending across all of our community with a focus on all of the credit needs in our community.

We are able to use the liquidity program to meet our needs. We also use the MPF program to provide long-term fixed rate loans to people in our community. Both products are important to our operation and need to remain available to us.

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.

I, Mark A. Goodin strongly recommend that you withdraw the proposed rule. Thanks for taking our comments into consideration.

Sincerely,

Mark A. Goodin, Co-CEO and Executive Vice President  
Community State Bank of Missouri

