

FIRST BANK & TRUST

December 22, 2014

Alfred M. Pollard, Esq., 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; Request for Comments – Members of the Federal Home Loan Banks

Dear Mr. Pollard:

I am submitting this comment to express concerns about the Federal Housing Finance Agency's ("FHFA") notice of proposed rulemaking and request for comments on "Members of the Federal Home Loan Banks" published on September 12, 2014. For the reasons described below, the First Bank & Trust management team respectfully requests the withdrawal of this proposal.

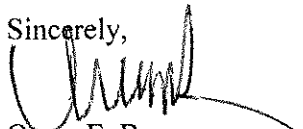
First Bank & Trust is a twenty year old community bank headquartered in Evanston, Illinois. We currently have over \$900 million of total assets. The bank's primary focus is lending to individuals and small businesses. The bank has relied upon the Federal Home Loan Bank of Chicago's advance commitments as one of our primary liquidity sources in times of economic uncertainty. It would be a significant hardship on our bank if we were to lose our membership in the Home Loan Bank if the level of our home mortgage assets dip below an arbitrary level set by the proposed rule.

First Bank & Trust is regulated by the State of Illinois Department of Financial Institutions and the Federal Reserve Bank of Chicago. Both regulators credit the Federal Home Loan Bank of Chicago advances availability in our overall liquidity program. If membership in the bank became uncertain, we would have to retain alternative forms of liquidity and consequently reduce credit extended into the community. This would be an unfortunate development for borrowers of all types in the Chicago land area.

We believe membership requirements should not be changed or left in doubt.

We appreciate your thoughtful consideration of our views.

Sincerely,



Owen E. Beacom
Chief Lending Officer
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