



Date: December 21, 2014

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

RE: RIN 2590-AA39.

Notice of Proposed Rulemaking and Request for Comments, Members of Federal Home Loan Banks.

Dear Mr. Pollard:

As a member of the FHLBank of Cincinnati, I am writing to express my opposition to the Federal Housing Finance Agency's (FHFA) proposed membership rule. My credit union, with assets of \$27 million, is subject to the most stringent mortgage-to-assets ratio test of 10 percent, as well as the broader one percent ratio test, as proposed in this rule.

The ongoing asset tests fail to recognize the many ways in which members support housing finance including pledging mission-assets to borrow advances, originating or selling mortgages into the secondary market, and investing in affordable housing and community development through the FHLBank's congressionally established Affordable Housing Program or other targeted community development programs.

My credit union relies upon the FHLBank for access to liquidity, balance sheet management and general funding to better serve our credit union members. If the rule were enacted as proposed, our credit union is at risk of failing the 10 percent ratio requirement. Membership termination is too harsh a penalty for non-compliance especially when collateral requirements are already in place to ensure secured lending and a connection to housing finance.

In 1989 Congress acted to include commercial banks and credit unions as members of the FHLBanks. For nearly 25 years, credit unions have been able to access reliable, low cost FHLBank funds helping to reduce lending costs for our members. This rule runs counter to congressional intent regarding equal access to FHLBank programs to serve



credit unions' cooperative membership whether through home ownership, small business loans, affordable auto loans or other credit needs.

The proposed rule appears to undercut FHLBank membership and congressional intent without identifying a safety and soundness concern. I respectfully request that the FHFA reconsider or withdraw the proposed rule.

Sincerely,

A handwritten signature in black ink, appearing to be "David W. Seeger", written over a horizontal line.

David W. Seeger
President and CEO
Great Lakes Credit Union
6600 Sylvania Ave. Ste. 6D
Sylvania, Oh 43560