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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 New Frontier Bank opposes this proposed rule.

I am Shelly Reuther, CFO of New Frontier Bank. Our institution provides lending across our community with a focus on commercial and commercial real estate loans. The Federal Home loan bank has helped our bank in various ways over the past 14 years. The two primary areas that has helped our bank is the ability to borrow money at selected maturities to match fund loans and to provide the ability to borrow as part of our liquidity contingency funding plan. The FHLB has been instrumental in strengthening our liquidity availability.

Your agency's proposed rules could fundamentally change how, or even whether, our financial institution will 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.

New Frontier Bank strongly recommends that you withdraw the proposed rule. Thanks for taking our comments into consideration.

Sincerely,

Shelly Reuther
CFO
New Frontier Bank