



LISTENING IS JUST THE BEGINNING.®

December 31, 2014

Alfred M. Pollard, Esq., General Counsel  
Attention: Comments/RIN 2590-AA37  
Federal Housing Finance Agency, Fourth Floor  
400 Seventh Street, S.W.  
Washington, DC 20024

**Re: Notice of Proposed Rulemaking and Request for Comments – Members of Federal Home Loan Banks (RIN 2590-AA39)**

Dear Mr. Pollard:

On behalf of Fulton Financial Corporation, I am writing to express my concerns about the notice of proposed rulemaking. While we appreciate your apparent desire to provide for a strong Federal Home Loan Bank System that supports housing, we believe the rule undermines the goal of the proposal.

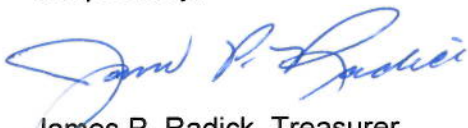
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2. Our regulator requires a reliable source of contingent liquidity. For us, this has always been my Home Loan Bank. With this rule, I'm concerned my regulator will not consider the FHLBanks reliable and may require another, more expensive, liquidity source.
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  - a. Creating a new ongoing 1% (or higher 2-5%) long-term mortgage assets test.
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Based on our belief that the proposals could harm FHLBank members and generally weaken a System that has worked well for more than 80 years, we urge the FHFA to reconsider this proposed rule, withdraw it, and if it determines that some changes of this nature are needed, then the FHFA should ask for further comment through public hearings, as well as consult with Congress and engage a more appropriate legislative process.

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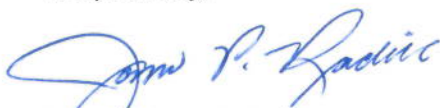
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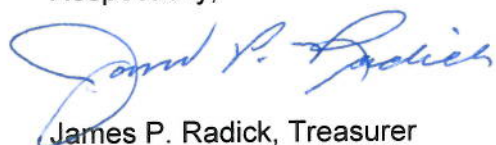
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