



December 26, 2014

Alfred M. Pollard, Esq., General Counsel  
Attention: Comments/RIN 2590-AA39  
Federal Housing Finance Agency, Fourth Floor  
400 Seventh Street, S.W.  
Washington, DC 20024

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

Dear Mr. Pollard,

On behalf of Landmark Community Bank, I am writing to express my thoughts regarding the notice of proposed rulemaking. While we appreciate your desire and the need to provide for a strong Federal Home Loan Bank System that supports housing, we believe the rule undermines the goal of the proposal.

As a community banker I manage the interest rate risk and liquidity risk for a community bank actively meeting the credit needs of the communities we serve. Our membership in the Federal Home Loan Bank of Pittsburgh has given us the ability to offer first time home buyers assistance through the First Front Door program and multiple businesses have utilized the Banking on Business loans to provide entrepreneurs in our communities financing assistance.

The Federal Home Loan Bank has been the most reliable source of liquidity for our institution because of the housing related loans and investments pledged as collateral. We are concerned the annual review of membership eligibility and potential future changes to proposed tests create too much uncertainty for the Federal Home Loan Bank to remain the most stable source of liquidity.

Based on our belief the proposals could harm FHLBank members and weaken a system that has worked well for more than 80 years, we respectfully ask that the FHFA withdraw the September 12, 2014 Notice of Proposed Rulemaking.

Sincerely,

Michael J. Sowinski  
Landmark Community Bank  
2 South Main Street  
Pittston, PA 18640

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