

# ALLIANCE

ARCHITECTS

January 5, 2015

Alfred M. Pollard, General Counsel  
Attn: Comments/RIN 2590-AA39  
Federal Housing Finance Agency  
Washington, DC 20024

RE: Notice of Proposed Rulemaking and Request for Comments - Members of FCHLBs (RIN 2590-AA39)

Dear Mr. Pollard:

I have proudly served on the FHLB Indianapolis Affordable Housing Advisory Council since January 2012. During these years, I have learned many things about the Federal Home Loan Bank system. More importantly, I have observed firsthand the great work possible as a result of the FHLBs' support through the Affordable Housing Program.

Unfortunately, over my 30 years' experience in Architecture and Engineering practice, I have also observed firsthand the difficulties regulations cause in making affordable housing a reality. I have seen more than one project delayed and even abandoned because funding could not be obtained. The Affordable Housing Program, in many projects, is the last weight that tips the scale toward moving ahead.

I ask that you seriously reconsider the proposed rule. Any revisions that would impact the number of FHLB member institutions and, thus, limit accessibility of Affordable Housing Program funds, should be avoided.

Let's take a look at the rule and see how we can increase the number of member institutions, especially small to medium institutions. This way we can increase the number of potential projects, thus creating more affordable housing!

Thank you for your consideration.

Sincerely,

ALLIANCE ARCHITECTS



Mark W. Leblang, PE RA  
Principal

MWL/bf