



January 5, 2015

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 Commercial Bank, I am writing to express my apprehensions 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.

The government should be looking for ways to help the economy, not impose a rule that could restrict the flow of credit to communities across America.

As a community bank just below the CFI definition of less than \$1.1 billion, it's tough enough to do business already. This rule would add uncertainty of going over and thus being subject to the 10 percent test. This seems like an arbitrary and unnecessary imposition of regulation that will affect our strategic business decisions.

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 ask that the FHFA withdraw the September 12, 2014 Notice of Proposed Rulemaking.

Respectfully,

A handwritten signature in black ink, appearing to read 'Deanna L. Vogt', is written over the typed name.

Deanna L. Vogt, VP
Commercial Bank

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St. Louis, MO 63146

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MEMBER FDIC