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January 7, 2015

Mark G. Field
President & Chairman
mfield@fblbank.com

Mr. Alfred M. Pollard, Esq., General Counsel
ATTN: Comments/RIN 2590-AA39
Federal Housing Finance Agency
400 Seventh St. SW, Eighth Floor
Washington, DC 20024

IN RE: Notice of Proposed Rulemaking: Request for Comments – Members of the FHLB's.

Dear Mr. Pollard,

Please have this proposal withdrawn immediately.

Even though the changes outlined in this proposal would not directly affect our \$90 million local community bank, at least as far as I can tell today, I do not see why these steps should be taken, or who in the world benefits by making such changes.

The number of bank charters has been declining for years, limiting the number of eligible institutions that CAN be members of our FHLB anyway, so why do we now want to turn banks away? Fostering competition in the marketplace by assisting banks with liquidity needs and keeping independent banks independent should be a sufficient mission for the FHLB system. Encouraging members to engage in building communities and expanding housing stock does not have to turn into red tape and strong-arm tactics to get the job done. There's plenty enough red tape and politics in every other aspect of our industry. This will just make it worse.

The Chicago FHLB and the MPF program are critical to our bank, and the small communities we serve. Please don't start throwing the baby out with the bath water.

Please withdraw this proposal.

Respectfully,

/S/

Mark G. Field