



Premier Spaces Real Estate

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December 30, 2014

Alfred M. Pollard, General Counsel
Attention: Comments/RIN2590-AA39
Federal Housing Finance Agency
400 Seventh Street SW, Eighth Floor
Washington, D.C. 20024

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

Dear Mr. Pollard:

I appreciate the chance to comment on the proposed changes to FHLB membership rules.

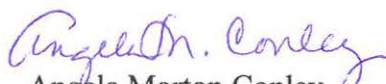
Although the rationale for these new membership requirements is noble, the end effect could be a loss of membership for smaller institutions that would find the mandate difficult to reach.

I am a Realtor and an Advisory Council member of the Federal Home Loan Bank of Des Moines. I have served on several boards pertaining to housing and I know firsthand the importance of credit unions and smaller neighborhood banks as it relates to educating consumers and readying them for home ownership. In St. Louis, these financial institutions are spearheading the campaign to end/reduce the numbers of "unbanked" in our community. They do important work in housing.

If their access to the Federal Home Loan Bank is denied because they cannot meet one portfolio requirement at any given time, the institution could become less competitive without access to the FHLBs which will in turn hurt, not help, the community in potentially greater numbers than too few mortgage loans on their books.

I urge you not to create these new requirements. Thank you for your consideration.

Sincerely,


Angela Morton Conley
Real Estate Broker

Personalized, Expert Service!

