

December 29, 2014

Alfred M. Pollard, General Counsel  
Attention: Comments/RIN 2590-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 Federal Home Loan Banks (RIN 2590-AA39)**

Dear Mr. Pollard:

Bethany Christian Services is a private not-for-profit child and family services agency operating in Michigan and throughout the U.S. Our involvement with the Affordable Housing Program (“AHP”) has allowed us to meet housing needs for our clients resulting in greatly improved service outcomes and improved lives. Without the availability of funding from the AHP program many projects would never have been developed and rent affordability levels would never have been achieved.

The proposed change to the membership requirements for the Federal Home Loan Bank (“FHLB”) will impose burdens on current FHLB member banks will lead to a reduction in the number of FHLB members throughout the country. The proposed changes will disproportionately impact small- and medium-sized financial institutions which are critical partners in redeveloping underserved rural areas of the country by providing long term permanent debt and sponsoring Affordable Housing Program (“AHP”) grants. Small and medium sized financial institutions operating in rural areas are many times the only banks that will sponsor an AHP grant for a small project due to location and/or the size of the permanent debt that a project can support. Merchants Bank of Indiana, State Bank of Lizton, and IU Federal Credit Union are all examples of small to medium sized financial institutions that have stepped up to sponsor projects that serve low income seniors, families, and especially persons with special needs. If changes proposed by FHFA result in the loss of these members, these populations will no longer be adequately served in the rural areas.

The member institutions of the Federal Home Loan Bank have contributed to restoring economic vitality to our communities, creating jobs, and providing credit facilities that otherwise may not have been available. We are concerned that the proposed changes to the FHLB membership requirements will undermine the economic recovery in our community and throughout our state and reverse the progress we are making to revitalize our communities and provide safe, decent, and affordable housing. On behalf of Milestone Ventures, Inc. and the communities/clients we serve, I urge you to withdraw RIN 2590-AA39 from consideration.

Sincerely,



George J. Tyndall, LMSW  
Regional Director of Operations  
Bethany Christian Services Of Michigan  
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