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January 9, 2015

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

Re: Notice of Proposed Rulemaking and Request for Comments – Members of Federal Home Loan Banks (RIN 2590-AA39)

Dear Mr. Pollard:

I am writing to submit a comment on the rule proposed by The Federal Housing Finance Agency regarding Federal Home Loan Bank membership requirements.

I am concerned that this proposal, if enacted, will have a significant negative impact on the ability of FHLB Boston to reliably and safely serve its membership. Although the Bank of Canton is well-positioned to meet the proposed requirements on an ongoing basis, this proposal will, in my opinion, almost certainly weaken the structure of the FHLBanks by limiting its membership.

The proposed membership requirements would add a significant level of uncertainty to FHLBank membership. The proposal would, in effect, mandate a member's asset allocation. Members would essentially have to manage their business model to ensure that their balance sheet meets the membership requirements in order to ensure access to FHLBank funding. As a CFO I would view this requirement as a significant drawback, and would necessarily view the FHLBank as a less reliable source of funding.

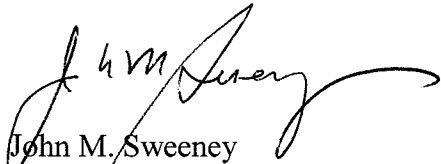
The FHLBank's cooperative structure is dependent on maintaining a diverse membership. In that respect it is similar to a healthy community bank that benefits from having both diverse funding sources and asset types. Limiting that membership would weaken that structure.

In addition to supplying products to meet our liquidity needs, the FHLBanks have been an important source of funding for low- and moderate-income housing in our market area. The Affordable Housing Program is funded by 10 percent of each FHLBank's net profits annually. FHLB Boston members have been awarded more than \$422 million in total subsidies and subsidized advances to create or preserve more than 25,000 affordable rental and ownership units in New England. The proposed rule would impact FHLB Boston's ability to grow and even maintain existing levels of advances, thereby leading to reduced funding of the AHP and fewer safe, decent, affordable housing options throughout New England.

Reliable access to FHLB Boston has been extremely important to our financial institution. The FHLBank business model has been a success for more than 80 years and must stay strong and stable so that the financial recovery can continue. For these reasons, I ask that the proposed rule be withdrawn.

Thank you for the opportunity to submit a comment.

Sincerely,



John M. Sweeney  
SVP / CFO