



January 12, 2015

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

Dear Mr. Pollard:

This letter is to express my strong opposition to the proposed Membership change being considered by your agency.

My community bank relies on the Federal Home Loan Bank of Cincinnati as a stable source of liquidity. The proposed Membership change has the potential to remove this source of liquidity should we fall below a 1% mortgage asset test. The proposed regulation requires banks to an ongoing "makes mortgages" test thereby destabilizing community banks that rely on FHLBank as a contingent funding source.

With its Congressional charter, Congress has always been interested in expanding not restricting membership at FHLBanks. Likewise, only Congress, not FHFA should establish or amend eligibility standards for membership in FHLBanks. In its 75+ year history, FHLBank of Cincinnati has never experienced a credit loss and operates in a sound and safe manner.

With this letter I respectfully request that FHFA withdraw the proposed FHLBank Membership rule as it has the potential to negatively impact the availability of credit for housing, and community and economic development.

Sincerely,

A handwritten signature in black ink, appearing to read "Wade Berry", is written over a horizontal line.

Wade Berry  
President/CEO

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