

LUBBOCK HOUSING FINANCE CORPORATION

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January 12, 2015

Director Melvin L. Watt
Federal Housing Finance Agency
400 Seventh Street SW, Eight Floor
Washington, DC 20024

Attention: Comments/RIN 2590-AA39

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

Dear Director Watt:

As a leader of an organization that works in affordable housing and community development, I have been one of many on the front lines of a long-standing effort for safe, decent and affordable housing in neighborhoods in the state of Texas. The last several years have presented overwhelming pressures and struggles within the housing community as traditional sources of financial support have declined. One of the very few consistent resources for affordable housing grants in my state has been the Federal Home Loan Bank of Dallas. Every year, millions of dollars are provided across FHLB Dallas' five state District – providing for the unmet housing needs of low- and moderate-income working families.

Your proposal shrinks the overall amount of money flowing through the FHLBanks and into the communities served by their member institutions. That flow creates revenue and earnings that produce the FHLBanks' very ability to provide a variety of grants and services to those of us in the affordable housing and community investment sectors.

Without the participation of FHLB Dallas members like Community Bank, stories like those of the Julian Martinez Cabrera, an Iraq war veteran, who was able to purchase a home for his family after a tornado destroyed the home where they were living, would not be possible. Mr. Martinez received a \$4,000 Homebuyer Equity Leverage Partnership grant sponsored by Community Bank and FHLB Dallas to pay for the down payment on his new home. This is just one example of the impact FHLB Dallas members have on our community.

Carl Russell, Jr.
President

Calvin Davis
Director

Dwight Overton
Vice President

Nita Kiesling
Director

Steve Yandell
Secretary

Debora Ruiz
Director

Tom Couture
Treasurer

Shari D. Flynn
Executive Director




Equal Housing
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A program that continues to be of benefit to working families throughout the South Plains of Texas is FHLB Dallas' Partnership Grant Program. This Program is voluntarily funded by FHLB Dallas, with the amount available for the Program being based on the Bank's earnings. As a result of receiving a Partnership Grant in 2010, the Coalition of Community Assistance Volunteers, Inc. ("CCAV") has been able to expand its services to assist more than 3,200 low income working families each income tax filing season. CCAV, a 501c3 non-profit, operates a Volunteer Income Tax Assistance program which provides free federal income tax preparation and e-filing services. In addition, it teaches the families it serves the importance of saving to purchase a home, for higher education, retirement, emergencies, etc. As a result of receiving the 2010 Partnership Grant, CCAV's capacity to enable working families to receive every penny of the federal income tax refunds to which they are legally entitled has increased over the years. In addition, these families (whose incomes average \$17,000 per year) save approximately \$300 in tax preparation, e-filing and rapid refund loan fees.

The housing community has been hit continually by budget cuts, economic declines, and political opposition at the local, state, and federal levels. By imposing the additional membership requirements on the FHLBanks, we will no doubt experience a diminished amount of funding in the affordable housing space. We do not want changes to one of our last, truly dependable mechanisms for support. We request that you reconsider your proposal, and allow FHLB Dallas members to continue as a source of gap financing and other project funding in our neighborhoods.

Sincerely,

A handwritten signature in cursive script that reads "Shari D. Flynn". The signature is written in dark ink and is positioned above the printed name.

Shari D. Flynn
Executive Director