



December 31, 2014

Alfred M. Pollard, Esq., General Counsel
Attention: Comments/RIN 2590-AA37
Federal Housing Finance Agency, Fourth Floor
400 Seventh Street, S.W.
Washington, DC 20024

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

Dear Mr. Pollard:

On behalf of County Bank of Rehoboth Beach, Delaware, I am writing to express my concerns about the notice of proposed rulemaking. While we appreciate your apparent desire to provide for a strong Federal Home Loan Bank System that supports housing, we believe the rule undermines the goal of the proposal.

This proposed regulation addresses a problem that does not exist. There are no safety and soundness problems at FHLBanks raised by lending to members that may fall below either of these proposed ongoing asset test levels. However, the proposal would impose new regulatory-type burdens and expense on my institution, may put me at odds with my own regulator, and could restrict the flow of capital into the communities we serve.

Additionally, my regulator requires a reliable source of contingent liquidity. For us, this has always been my Home Loan Bank. With this rule, I'm concerned my regulator will not consider the FHLBanks reliable and may require another, more expensive, liquidity source.

Based on our belief that the proposals could harm FHLBank members and generally weaken a System that has worked well for more than 80 years, we ask that the FHFA (withdraw, reconsider) the September 12, 2014 Notice of Proposed Rulemaking.

Respectfully,

David Gillan
Chairman and CEO
County Bank
19927 Shuttle Road
Rehoboth Beach, DE. 19971

Rehoboth Beach
(302) 226-9800

Long Neck
(302) 947-7300

Milford
(302) 424-2500

Millville
(302) 537-0900

Georgetown
(302) 855-2000

Lewes
(302) 645-8880

Milton
(302) 684-2300