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June 11, 2018

Mr. Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA83
Federal Housing Finance Agency
400 Seventh Street, SW, Eighth Floor
Washington, D.C. 20219
Submitted online at www.fhfa.gov

Re: Notice of Proposed Rulemaking and Request for Comments –
RIN 2590-AA83 – Affordable Housing Program Amendments

Dear Mr. Pollard:

The following comments are submitted on behalf of the Independent Bankers Association of Texas (IBAT), a trade association representing nearly 400 independent, community banks domiciled in Texas. On behalf of our members, who control more than \$180 billion dollars in total assets, we appreciate the opportunity to comment on your recently released proposed rulemaking regarding the Federal Home Loan Banks' (FHLBanks) Affordable Housing Program (AHP).

IBAT has concerns regarding the Federal Housing Finance Agency's (FHFA's) proposed rule's outcomes-based framework that would, in our opinion, constrain the discretion of the FHLBank Dallas to utilize AHP funds to address local housing needs.

It's worth noting that the FHLBank Dallas has contributed more than \$14 million dollars in Texas during the last five years through the AHP program. Because of the current flexibility afforded the FHLBank Dallas in the program as written, those funds have been used to address the specific housing needs of local communities in want of affordable housing—the lack of which can be a serious impediment to growth and expanded economic opportunity in Texas and the surrounding states served by both our members and the FHLBank Dallas.

We support proposed amendments that would provide FHLBanks the continued flexibility, via a scoring-based system, to meet the specific housing needs in local districts rather than the FHFA's overall housing goals. A scoring-based system that addresses local community needs and maintains transparency in the process is a better alternative for the local communities our members are proud to serve.

On behalf of our members, we respectfully request that you reconsider the proposed rule's outcomes-based framework and replace it with a scoring-based system that focuses on the unique needs of local communities.

Respectfully submitted,


Christopher L. Williston, CAE
President and CEO