Goodwill Industries of Northern Michigan





July 13, 2006

Mission Statement:

A community service agency that enables persons facing barriers to employment and independence to achieve their Washington, DC 20006-4001 full potential.

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Services:

Community Support Services Homeless Services Outreach Services Youth/Adult Court Services

Contract Services

Vocational Services

Workers on Wheels

Meals on Wheels

Retail Store and Donation Centers

GIVS Volunteer Services







The Honorable Ronald A. Rosenfeld

Chairman

Federal Housing Finance Board

1625 | Street N.W.

Re: Public Comments Excess Stock Restrictions and Retained Earnings Requirements for the Federal Home Loan Banks

#3069-AB30

Dear Chairman Rosenfeld:

I am writing to express my concern over the possible negative affects of the proposed capital rule on the Federal Home Loan Banks, specifically the Federal Home Loan Bank of Indianapolis, and its ability to continue investing in our communities.

The homeless in our Northern Michigan Community have been well served by the current set of rules governing the FHLBI. Goodwill Industries was awarded a major grant in 2005 from FHLBI to assist construction of transitional housing and a crisis shelter facility to serve the five county Northern Michigan Area. Any rule changes that might reduce the FHLBank asset size, mortgage holdings and liquidity investments, will ultimately reduce Bank income which will in turn reduce the amount of funding that is available to agencies like Goodwill. Current Bank projections estimate the impact of proposed rule changes will reduce grants to moderate and low-income families by over \$1 million per year. This has a drastic affect on these families and children, as well as our communities as a whole.

On behalf of the homeless and low income families in the Traverse City Area, I ask that the Board reconsider proposed changes that will negatively impact the Affordable Housing Program.

Sincerely,

Cecil McNally

Executive Director

Goodwill Industries of Northern Michigan

231-995-7710