



July 13, 2006

Federal Housing Finance Board  
1625 Eye Street, NW  
Washington, DC 20006

Attention: Public Comments  
Excess Stock Restrictions and Retained Earnings Requirements for  
The Federal Home Loan Banks  
#3069-AB30

I am writing to express my concern over the impact of the proposed capital rule on the FHLBank of Cincinnati and its ability to support its housing mission. I represent FirstBank, Lexington, Tennessee, a member of the FHLBank. We have partnered with the FHLB through its Affordable Housing Program, to provide housing in conjunction with non-profit organizations and seek to do additional partnerships through the FHLBank's other programs such as Welcome Home, American Dream Homeownership Challenge and others.

FHLBank funding is often the critical first level of financial commitment to complex housing projects. It helps leverage other sources of public and private funding and brings together the necessary partners and leaders for effective development. The FHLBank's affordable housing programs provide us with a very powerful tool to address the housing needs of customers with limited resources. These customers may be on the threshold of starting new jobs, opening their first business, or making that jump to homeownership to begin building equity for the future.

The FHLBank has demonstrated its commitment to affordable housing over and above its mandated Affordable Housing Program. The proposed regulation would seem likely to shrink the size of the FHLBank, reduce its profitability, increase costs to our institution, all to no apparent benefit. Why penalize the FHLBank member lenders and our customers? With fewer state and federal housing dollars available for targeted affordable housing, we strongly urge you to reconsider this restrictive regulation that will result in lower FHLBank profits and, by extension, fewer residents gaining access to affordable housing.

Sincerely,

A handwritten signature in cursive script that reads 'Doug Cruickshanks'.

Doug Cruickshanks  
President & CEO