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July 13, 2006

Federal Housing Finance Board
Attention: Public Comments
1625 Eye Street, N.W.
Washington, D.C. 20006

**RE: Federal Housing Finance Board Proposed Rule: Excess Stock Restrictions and Retained Earnings Requirements for the Federal Home Loan Banks
RIN Number 3069-AB30, Docket Number 2006-03**

Dear Sir or Madam:

In response to your invitation for public comments on the referenced proposal, I write to offer certain suggestions. As bankers, we understand the importance of the FHLB member Banks and particularly the Atlanta Bank of which we are members/shareholders. We use various FHLBank Atlanta products and programs to meet the needs of our customers and communities. The role that the FHLBank plays in our business is essential to our ability to extend vital financial services and credit to our communities. For this reason, it is extremely important that in developing regulations aimed at ensuring the safe and sound operations of the FHLBanks, the Finance Board constructs its proposed rules in a way that does not impose unnecessary economic burdens on the FHLBanks or their member financial institutions.

Because we believe the proposed rule to be burdensome and unnecessary, we urge the Finance board to withdraw the proposed rule, and instead issue an Advanced Notice of Proposed Rulemaking (ANPR). This would allow a more deliberative process prior to the issuance of a rule that has significant implications for both the Federal Home Loan Banks and their membership. Given the fact that there does not appear to be a capital crisis on the immediate horizon, a more thoughtful approach to the issue would seem to be wise.

In the event that the Finance Board declines to withdraw the proposed rule and issue an ANPR, we would recommend that the rule be modified to (a) take into consideration the different risk characteristics of assets held on the FHLBanks' balance sheets, (b) establish a specific transition period for the FHLBanks to achieve their retained earnings requirements; and, (c) ensure that during the transition period, no additional limits be imposed on the amount of earnings that can be paid as dividends, so long as the FHLBank has established an acceptable capital plan for meeting and continuing to meet its retained earnings target and is on schedule to do so.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger D. Murphree".

Roger D. Murphree
Sr. EVP & COO