



MEMBER FDIC

July 3, 2006

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

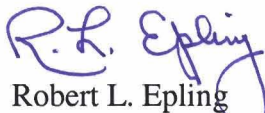
RE: FHL Banks Capital Structure

Gentlemen:

We are writing to comment on the proposed rule (3-15-06) which would change the capital structure of the FHL Banks.

Our request for consideration is to insure consideration of risk-weighting of assets on FHL Banks balance sheets; establish a specific transition period and ensure no additional limits are imposed on the amount of earnings that can be paid as dividends, as long as the FHL Bank has established an acceptable plan for meeting and continuing to meet its retained earnings target.

Sincerely,


Robert L. Epling
President

RLE:lb