

**EDWARD W. LIMBACH**  
**332 INWOOD TRAIL**  
**AURORA, OHIO 44202**  
**330-995-3378**  
**ELim784586@aol.com**

July 1, 2006

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

Attn: 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 am a member of the board of Habitat for Humanity of Portage County, Ohio, a non profit organization providing home ownership to families that the household income falls below 60% of the area median income. My Habitat Affiliate has built or renovated 46 homes and has partnered with the FHL Bank to provide down payment assistance on the majority of these houses.

FHLBank funding is often the critical first level of financial commitment to our projects. It helps leverage other sources of public and private funding and bring together the necessary partners and lenders for effective development. As the highly successful Affordable Housing Program is based on a 10 percent set-aside of annual net profits, we all have a stake in the success and profitability of the FHLBank.

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 its members, all to no apparent benefit. Why penalize the FHLBank member lenders, housing partners and our at-risk clients? With fewer state and federal housing dollars available for targeted affordable housing, I strongly urge you to reconsider this restrictive

regulation that will result in lower FHLBank profits and, by extension, fewer residents gaining access to decent and affordable housing.

Sincerely,

A handwritten signature in black ink, reading "Edward W. Limbach". The signature is written in a cursive style with a large, prominent initial "E".

Edward W. Limbach  
Director of Public Relations

Copy: U.S. Representative Steven LaTourette  
U.S. Representative Tim Ryan  
U.S. Senator Mike DeWine  
U.S. Senator George Voinovich