



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

Attention: Public Comments

Proposed Rule: Excess Stock Restrictions
And Retained Earnings Requirements for
the Federal Home Loan Banks. RIN
Number 3069 – AB30.

Please consider America's Community Bankers and other banking trade associations joint letter that urged the Board to withdraw the proposed rule and reissue it as an Advance Notice of Proposed Rulemaking to facilitate a discussion among the Finance Board, the FHLBs, FHLB members and other interested parties.

The proposal overturns the capital plans, called for by the Gramm–Leach–Bliley Act of 1999, that the FHLBs spent years and significant dollars developing – plans implemented with FHFB approval.

The letter was developed from discussion at a meeting of banking trade associations and interested parties which I attended.

Sincerely;
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