

HUGHES ARCHITECTURE, INC.

Multi-family, Specialized & Senior Housing Communities Design + Special Services + Land Planning + Urban Design + Architecture

7105 Poplar Terrace
Pewee Valley, KY 40056 USA
502.243.3889 Voice
502.241.5407 Fax
www.hughesarchitecture.com

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VIA FACSIMILE: (202) 408-2580

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. Our firm has for decades provided architectural services to many non-profit and for profit organizations which provide housing opportunities that serve low income elderly populations, physically handicapped individuals, clients with mental retardation or mental health challenges and rural low-income populations for whom safe, decent and affordable housing is in very short supply.

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 leaders for effective development. As the highly successful Affordable Housing Program is based on a 10 percent set-aside of annual net profits, the clients we serve all have a stake in the success and profitability of the FHLBank.

The FHL Bank 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 its costs to its members, all to no apparent benefit. Why penalize the FHLBank member lenders, along with its housing partners and the at-risk clients they serve, for successfully fulfilling their mission? With fewer state and federal housing dollars available for targeted affordable housing, I strongly urge you to reconsider this restrictive regulation that would result in lower FHLBank profits and effectively result in fewer residents gaining access to decent housing.

Sincerely,

HUGHES ARCHITECTURE, INC.


Roger C. Hughes, AIA, President

cc: Rep. Geoff Davis
Sen. Mitch McConnell
Sen. Jim Bunning