



**Cocaine Alcohol Awareness Program Inc.**  
*A Professional Behavioral Health Care Facility*  
*Serving Memphis Since 1989*

June 20, 2006

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

Cocaine & Alcohol Awareness Program Inc. (CAAP)  
4041 Knight Arnold Rd. Ste. 300  
Memphis, TN 38118

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 represent C.A.A.P. Inc, a nonprofit organization providing housing services to adult homeless persons who are at risk, chronically homeless individuals, and persons seeking home ownership, however are excluded due to preventable barriers. C.A.A.P. Inc. operates principally in Memphis/Shelby County Tennessee. Our organization has partnered with the FHLBank to provide 58 units of single family dwellings. The entire project cost was in excess of 1.2 million dollars. FHLB collaborated with C.A.A.P. Inc., the City of Memphis and others to make this project a reality. FHLB provided a \$500,000 AHP grant.

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, we all have a stake in the success and profitability of the FHLBank.

**C.A.A.P. INC. 4041 Knight Arnold Ste. 300 Memphis, TN 38118**  
**Tel: (901) 360-0442 Fax: (901) 360-0865**

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 housing.

Sincerely,

A handwritten signature in black ink, reading "Albert L. Richardson". The signature is written in a cursive style with a large, stylized initial "A". To the right of the signature, there is a small, circular stamp or mark containing a stylized letter, possibly "M".

Albert L. Richardson  
Executive Director