

## KENTUCKY RACING HEALTH & WELFARE FUND

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June 6, 2006

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

Attention: Pubic 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 represent The Kentucky Racing Health and Welfare Fund, Inc. a nonprofit organization which sponsors housing services for elderly and retirement thoroughbred race track workers, and others, who demonstrate need in Kentucky. My organization has partnered with the FHLBank to provide 40 one bedroom and studio units in the refurbished 100 year old John Heywood Elementary School in Louisville.

In 2004 the project was the winner of The Ida Lee Willis Memorial Foundation Award, which is Kentucky's most prestigious preservation project award. I have enclosed a copy of the award certificate.

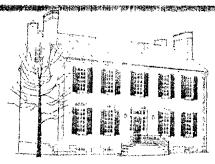
FHLBank funding is often the critical first level of financial commitment to our projects. It helps leverage other sources of public and private funding and brings together the necessary partners and leaders for effective development. As the highly successful Affordable Housing Program is based on a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

The FHLBank has demonstrated its commitment to affordable housing over and above it 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 atrisk clients? With few 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.

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Yours truly,

Executive Director



## The Ida Lee Willis Memorial Foundation

## AWARI

Preservation Project

May-2004

In recognition of the significant accomplishment involving the preservation and historic rehabilitation of the Old Heywood School in Louisville, this award is presented to

Don Ball, Susan Bunning, Cary Golde, Carol W. Hebel Rick Hiles, Frank L. Jones, Jr., Dale Romans, Peter W. Salmen, Ir., and Richard P.Riedel

Commonwealth of Kentucky

Preservation Kentucky, Inc.