Bramble
SAVINGS BANK

June 6, 2006

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

Attention: Public Comments
                Federal Housing Finance Board Proposed Rule: Excess Stock Restrictions
                and Retained Earnings Requirements for the Federal Home Loan Banks
                RIN Number 3069-AB30
                Docket Number 2006-03

We appreciate the opportunity to comment on the above noted proposal. Bramble
Savings Bank is a small, FDIC-insured, state-chartered savings bank in southwestern
Ohio. Like most small banks, Bramble has come to rely on the Federal Home Loan Bank
(FHLB) to allow it to compete with the larger financial institutions in the marketplace.
We believe that this proposal would be injurious to the FHLB of Cincinnati (our local
FHLB) and, in the long run, to our bank.

We understand that the Federal Housing Finance Board's mission is to regulate the
Federal Home Loan Banks and ensure that they operate in a safe and sound manner while
carrying out their mission to finance housing and community development. Adequate
capitalization is a necessity for safe and sound operation. However, this proposal would
force each FHLB to repurchase excess stock held by financial institutions. This would
lower the liquidity position of each FHLB, possibly shrinking the level of Advances to
member institutions like ourselves and most likely resulting in a taxable event for our
bank. Coupled with a requirement for higher earnings in order to meet the retained
earnings requirements, the services of the FHLB will be impacted for months, if not years
to come. We can see no positive effect from this proposal.

If this proposal was intended as a preventive measure to assure that poor practices
followed by a few FHLBs were not repeated in others, we believe that its punitive aspects
more than undo any common good. We believe that as a regulator the FHFB already has
the tools in its arsenal to punish wrongdoers while leaving the rest of the FHLB System
in peace.

We encourage you to withdraw this proposal.

Yours truly,

James Wm. Gronefeld
Vice President