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June 5, 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

On behalf of the shareholders, board of directors, management, and employees of North Akron Savings Bank, I would like to provide formal comment on the proposed Housing Finance Board Ruling, which restricts excess stock and increases the retained earnings requirements for all twelve Federal Home Loan Banks. We appreciate the opportunity to comment on the impact of this rule and we urge the Federal Housing Finance Board to consider the potential negative impact felt by the stockholders of the Federal Home Loan Bank System in making their final decision.

As stockholders in the Federal Home Loan Bank of Cincinnati, we are against this proposed rule based upon the potential negative results to its member banks and we respectfully request your withdrawal of the proposed rule. Not only does enacting this proposed rule reduce the financial strength of the Federal Home Loan of Cincinnati, but it also creates negative and unintended organizational, financial, and social consequences for North Akron Savings Bank by:

- Creating a taxable event for us as a result of redeeming excess Federal Home Loan Bank Stock
- Eliminating a potential safe investment for us by limiting the availability of FHLB stock
- Reducing the future income streams of community banks by limiting dividend payouts by the Federal Home Loan Banks

- Reducing the value of membership in the Federal Home Loan Bank System by diminishing its services to member banks
- Reducing the availability of Affordable Housing Funds by reducing the pool of income from which these funds are obtained
- Increasing the cost of borrowing from the Federal Home Loan Banks as a result of a reduction in the Federal Home Loan Bank's investment rating

In light of these unintended results, we feel strongly that the ability for the Federal Home Loan Bank to provide valuable and reasonably priced products to its members will be significantly impaired by enacting the proposed ruling. We also strongly believe that the ultimate effect upon the community based institutions like North Akron Savings Bank will prove costly in terms of its ability to meet the needs of its customers, its ability to earn income, its ability to meet its social obligations, and its ability to remain a viable part of the community. We respectfully submit this commentary and appreciate your consideration of all of the potential results of this proposed ruling.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt A. Winebrenner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kurt A. Winebrenner
Executive Vice President
Chief Operating Officer