

Steve Trager Chairman & CEO

Republic Bank Corporate Center 601 West Market Street Louisville, Kentucky 40202 502-561-7122 Fax 502-561-7188 strager@republicbank.com

June 2, 2006

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

ATTN: 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

I am a member stockholder of the FHLBank Cincinnati and greatly value my investment in the FHLBank and the resulting services my institution is able to provide to my customers. I strongly feel the above referenced proposed rule is unnecessary and harmful to the FHLBank, my institution and my customers. I respectfully request that this proposed rule be withdrawn.

The FHLBank is a well capitalized, low-risk profile, triple-A rated financial institution. It would be detrimental to require the FHLBank to substantially limit dividends while building retained earnings, reduce excess stock held by members, and cease paying dividends in the form of additional shares of capital stock. Without adequate explanation or clear methodology, this rule puts the Cincinnati FHLBank in a position of lowering liquidity, reducing capital and lowering profitability. The results are going to be fewer products and services at higher costs for my bank.

Our institution is an active participant in the FHLBank's Affordable Housing Program and American Dream Homeownership Challenge program. It is greatly disappointing that **Federal Housing Finance Board** June 2, 2006 Page 2

the overall effect of this rule will reduce, or possibly eliminate, some of this funding and innovation for our lower-income customers. The FHLBank System is a model that works for and with our bank, our customers and our community.

Thank you.

Respectfully submitted,

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**Steve Trager** 

cc: **Senator Mitch McConnell Senator Jim Bunning Congressman Geoff Davis**