



VIA E-MAIL TO REGCOMMENTS@FHFA.GOV

February 1, 2012

Alfred M. Pollard, Esq.
General Counsel
Federal Housing Finance Agency
Fourth Floor
1700 G Street, N.W.
Washington, DC 20552

Re: Federal Home Loan Bank Community Support Amendments; RIN 2590—AA38

Dear Mr. Pollard:

We submit this letter in response to the request for comments issued by the Federal Housing Finance Agency on November 10, 2011, when it proposed amending its community support regulation to, among other things, require the Federal Home Loan Banks to monitor and assess each member's compliance with the Community Reinvestment Act of 1977 and first-time homebuyer standards in order to access Federal Home Loan Bank long-term advances. We appreciate your consideration of our views on this important matter.

The Brattleboro Savings and Loan Association is a \$185MM state chartered mutual savings bank, serving Windham and southern Windsor Counties in Vermont, as well as the western portion of Cheshire and Sullivan Counties in New Hampshire. As a mutual savings institution, we have long history of meeting the credit needs of our community and working with various organizations to promote home ownership amongst first time homebuyers. With a loan to deposit ratio in excess of 100%, we also have a long history of availing ourselves of long term advances from the Boston Home Loan Bank to provide those loans.

We have serious concerns that the proposed rule would require the Federal Home Loan Banks to act as regulators of their members. The rule proposes to delegate responsibility for determining member compliance with the FHFA's community support requirements from the FHFA to the Federal Home Loan Banks. We disagree with this approach, and believe that the FHFA is best suited to determine compliance with its own regulation. The Federal Home Loan Banks should be allowed to continue doing what they do best — fulfilling their mission by offering advances and community investment products to their members.

We recommend that the FHFA amend its proposed rule and keep responsibility for determining compliance with its community support regulation at the FHFA. This will ensure that the Federal Home Loan Banks are not required to act as regulators of their members.

Thank you for your consideration of our comments.

Sincerely,

Daniel C. Yates
President & CEO

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