



Cambridge Trust Company

1336 Massachusetts Avenue, Cambridge, Massachusetts 02138

Member FDIC

February 1, 2012

Alfred M. Pollard, Esq., General Counsel
Federal Housing Finance Agency
1700 G Street, N.W. – Fourth Floor
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 FHLBank long-term advances. We appreciate your consideration of our views on this important matter.

Cambridge Trust Company is based in the heart of Harvard Square, Cambridge, Massachusetts and is a 122-year-old State chartered commercial bank with \$1.3 billion in total assets and 11 Massachusetts locations in Cambridge, Beacon Hill, Belmont, Concord, Lexington, Lincoln and Weston. Cambridge Trust Company is also one of New England's leaders in wealth management with \$1.5 billion in client assets under management. In addition, Cambridge Trust Company offers wealth management services at two New Hampshire locations, Concord and Portsmouth.

We have serious concerns that the proposed rule would require the FHLBanks 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 FHLBanks. We disagree with this approach, and believe that the FHFA is best suited to determine compliance with its own regulation. The FHLBanks 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 FHLBanks are not required to act as regulators of their members.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert R. Rietheimer". The signature is fluid and cursive, with a small mark above the "i" in "Rietheimer".

Albert R. Rietheimer
SVP/CFO/Treasurer