

*Brighton Commerce Bank*

July 6, 2006

Federal Housing Finance Board  
1625 Eye Street, NW  
Washington, DC 20006  
Attn: Public Comments

Re: Federal Housing Finance Board Proposed Rule: Excess Stock Restrictions and Retained Earnings Requirement for the Federal Home Loan Banks.

Dear Sirs:

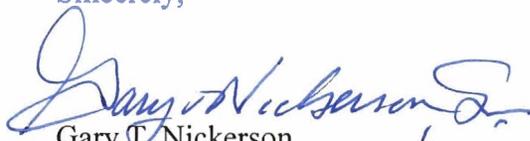
We are writing to you as a member and shareholder of the Federal Home Loan Bank of Indianapolis ("FHLBI"). We believe the current proposal (Rule #2006-03) to impose a limitation on dividends based upon new stringent retained earning requirements will adversely impact the FHLBI and member institutions.

We believe the proposal could result in the following:

- 1) increase borrowing costs
- 2) lead to potential withdrawals of member banks
- 3) reduce the FHLBI asset size and funds available for the Affordable Housing Program
- 4) decrease the economic value of the stock
- 5) deleverage the FHLBI.

Please withdraw the current one size fits all proposal and consider risk-based capital rulemaking in future proposals. We concur with the recommendation from the Board of Directors of the FHLBI that current proposal be withdrawn.

Sincerely,



Gary C. Nickerson  
President & CEO



John Szydzik  
Senior Vice President & Cashier

Cc: Martin L. Heger, FHLBI  
Diane Bissell, Michigan Bankers Association