



December 28, 2009

By e-mail to [RegComments@FHFA.gov](mailto:RegComments@FHFA.gov)

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

Attention: Comments/RIN 2590-AA03

Re: Federal Home Loan Bank Boards of Directors: Eligibility and Elections

Dear Mr. Pollard:

The Federal Home Loan Bank of Topeka ("FHLBTopeka") appreciates the opportunity to comment on the notice of proposed rulemaking ("Proposed Rule") published by the Federal Housing Finance Agency ("FHFA") in the *Federal Register* December 1, 2009 addressing the process by which successor directors are chosen after a Federal Home Loan Bank directorship is redesignated to a new state prior to the end of its term as a result of the annual designation of FHLBank directors.

FHLBTopeka requests the FHFA amend the language in proposed §1261.3(e) to clarify that the term of office for the new directorship is being "adjusted" to correspond with the language in §1261.4(d)(2)(i). Such clarification will provide consistency in the language of the two subsections. Specifically, it will clarify that the term of the redesignated directorship is being "adjusted" and therefore does not constitute a full term, as provided in §1261.4(d)(2)(i). Accordingly, FHLBTopeka suggests that the last sentence of §1261.3(e) read as follows: "The new directorship shall be filled by a vote of the members in the succeeding State and, in order to maintain the staggered terms of directorships, shall be adjusted to a term equal to the remaining term of the previous directorship if it had not been redesignated to another State."

We appreciate the opportunity to comment on this proposed rule and thank you for your consideration of our comments.

Alfred M. Pollard, Esq., General Counsel, FHFA  
December 28, 2009  
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If you have any questions, please contact me at (785) 438-6054.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick C. Doran". The signature is fluid and cursive, with a large initial "P" and a long, sweeping underline.

Patrick C. Doran  
Senior Vice President and  
General Counsel