



March 24, 2011

Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA39
Federal Housing Finance Agency - Fourth Floor
1700 G Street, NW
Washington, D.C. 20552

Re: Advance Notice of Proposed Rulemaking and Request for Comments – Members of
Federal Home Loan Banks (RIN 2590-AA39)

Dear Mr. Pollard:

I am writing as the Program Director for Fort Wayne Rescue Mission Ministries. I would like to thank you for the opportunity to submit comments on the advance notice of proposed rulemaking (ANPR) regarding Federal Home Loan Bank membership.

Based on my understanding of the ANPR proposals, its implementation would reduce FHLB System membership, and have a decidedly negative impact on insurance companies. Since insurers have played a critical role supporting the work of the Fort Wayne Rescue Mission through their foundations and the FHLBI Affordable Housing Program (AHP), this is of great concern.

Like many areas of the Midwest, Fort Wayne has been greatly impacted by the “Great Recession.” The economic distress has increased demand for our services at a time when donations have declined and many of our local depository institutions have also been suffering. With this challenging backdrop, the Fort Wayne Rescue Mission embarked on an ambitious project to double the capacity of our Charis House ministry which provides food, clothing, shelter, and life-changing programs for women and children suffering from homelessness, mental illness, addictions, trauma, and/or physical abuse.

A key component of the expansion of Charis House was an AHP application for a \$750,000 grant during the first round of 2009. The project was initially sponsored by a local bank. Our bank, along with many of its peers, was dealing with existing credit problems and decided to pull out of the project at the 11th hour. Given the project’s size, the late date, and the financial distress in our market, we were unable to find a replacement bank sponsor. Fortunately, our property casualty insurance company (Brotherhood Mutual Insurance) was a member of the FHLBI and was more than willing to sponsor the project. Without Brotherhood Mutual’s willingness to step into the void and sponsor our AHP application, the Charis House project would not have been possible.

It should also be noted that Brotherhood Mutual and fellow FHLBI member Lincoln Life Insurance Company have also been major financial supporters of the Fort Wayne Rescue
“A home for the homeless, food for the hungry, and hope for their future through Jesus Christ.”

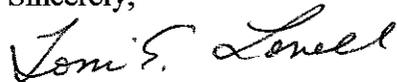
Mission through their foundations. Brotherhood Mutual has awarded a grant in the amount of \$50,000 to the new Charis House Project. Also, they have partnered with us in our new marketing campaign by consulting with us on our marketing strategies. Additionally, they offered employment opportunities to one of our Program graduates. Lincoln Life cannot support us directly due to our faith-based status. However, they make it possible for us to utilize 4 day care slots for our children at a local daycare center, Early Childhood Alliance. This is a \$20,655 value made available to our organization, Ft. Wayne Rescue Mission Ministries, on an annual basis.

Based on our experience, insurance companies are active participants in the FHLB's mission. Insurance companies have played a critical part supporting the Fort Wayne Rescue Mission and the FHLB System's mission in our community. While both Brotherhood Mutual Insurance Company and Lincoln Life Insurance Company have clearly supported the FHLB's mission in our community, neither organization is in compliance with the ANPR's 10% test. Clearly, this and other "bright line" tests contemplated by the ANPR are poor measures of whether an insurance company member is supporting the FHLB's mission.

Since the ANPR proposals would have a negative impact on the Fort Wayne Rescue Mission, its insurance company partners, and could encourage FHLB membership withdrawals, I respectfully request that the ANPR be withdrawn from consideration.

Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script that reads "Toni S. Lovell".

Toni Lovell, MSW, LCSW, ICAC-II, NCAC-II
Program Director
Fort Wayne Rescue Mission Ministries