



New Tripoli Bank

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January 6, 2015

Alfred M Pollard, Esq., General Counsel
Attention: Comments/RIN 2590-AA37
Federal Housing Finance Agency, Fourth Floor
400 Seventh Street, S.W.
Washington, DC 20024

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

Dear Mr. Pollard:

On behalf of New Tripoli Bank, I am writing to express my concerns about the notice of proposed rulemaking. While we appreciate your apparent desire to provide for a strong Federal Home Loan Bank System that supports housing, we believe the rule undermines the goal of the proposal.

It seems this rule has the potential to restrict access to liquidity at the exact point in time when more, not less, liquidity is needed in a recovering market. While many depository institutions are flush with deposits at the current time, most observers believe that this may change when interest rates inevitably rise.

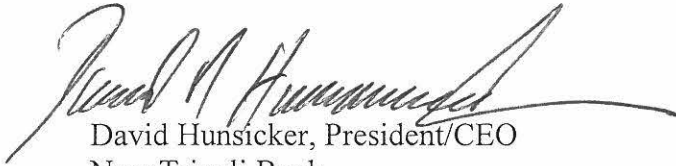
The majority of the types of collateral eligible to be pledged to secure advances under the FHFA regulations are housing assets (e.g., various types of mortgage loans, mortgage-backed securities and home equity loans). Consequently, advances from FHLBanks provide liquidity for these housing assets.

As a small bank, I worked hard to have the Congress exempt institutions under \$500 billion in assets from the 10 percent test to join FHLBanks in 1998. In 2008, I was glad to see the Congress increase the eligibility for this exemption to institutions with \$1 billion in assets. That number is now inflation-indexed to bring it to \$1.1 billion.

Simply put, I don't want to have to think about the potential of losing my FHLBank membership as I make business decisions and deal with the numerous existing and changing regulations and risks I have to manage. I run my institution to be safe, profitable and useful to my customers-not to meet an arbitrary test.

Based on our belief that the proposals could harm FHLBank members and generally weaken a System that has worked well for more than 80 years, we ask that the FHFA reconsider the September 12, 2014 Notice of Proposed Rulemaking.

Respectfully,

A handwritten signature in black ink, appearing to read "David Hunsicker", with a long, sweeping horizontal line extending to the right.

David Hunsicker, President/CEO
New Tripoli Bank
6748 Madison Street
New Tripoli, PA 18066