



June 5, 2006

Federal Housing Finance Board
1625 Eye Street, NW
Washington, DC 20006

Attention: Public Comments
Excess Stock Restrictions and Retained Earnings Requirements for
The Federal Home Loan Banks
#3069-AB30

I am writing to express my concern over the impact of the proposed capital rule on the FHLBank of Cincinnati and its ability to support its housing mission. I represent Bramble Savings Bank, a long standing member of the FHLBank of Cincinnati. We have partnered with the FHLBank through its Welcome Home Program to provide numerous loans that enable many first time home buyers the opportunity to provide a better life for their families.

FHLBank funding is often the critical first level of financial commitment to complex housing projects. It helps leverage other sources of public and private funding and brings together the necessary partners and leaders for effective development. The FHLBank's affordable housing programs provide us with a very powerful tool to address the housing needs of the customers with limited resources. These customers may be on the threshold of starting new jobs, opening their first business, or making that jump to homeownership to begin building equity for the future.

The FHLBank has demonstrated its commitment to affordable housing over and above its mandated Affordable Housing Program. The proposed regulation would seem likely to shrink the size of the FHLBank, reduce its profitability, increase costs to our institution, all to no apparent benefit. Why penalize the FHLBank member lenders and our customers? With fewer state and federal housing dollars available for targeted affordable housing, I strongly urge you to reconsider this restrictive regulation that will result in lower FHLBank profits and, by extension, fewer residents gaining access to affordable housing.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Scott Losekamp", with a stylized flourish at the end.

C. Scott Losekamp
President and CEO

Branch Office
2100 Sherman Avenue
Norwood, OH 45212
(513) 631-4245

Main Office
954 State Route 28
Milford, OH 45150
(513) 248-1222

Branch Office
11951 Hamilton Avenue
Pleasant Run, OH 45231
(513) 825-0333