



# DRANE & COMPANY, PLLC

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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

This letter is in response to the proposed capital rule on the FHLBank of Cincinnati and my concern regarding its ability to support its housing mission. We are auditors for a number of projects providing housing services to elderly and low-income families and individuals.

As part of our audit services, we review samples of tenant files to ensure eligibility for the program. As such, we have first-hand knowledge of the struggles most of these families have in obtaining decent housing. Without FHLBank funding, it is likely that their only choice would be homes with substandard structures and inadequate heating and ventilation.

With the tremendous impact this program has had on the lives of residents, I am hoping that you will reconsider any regulations which would restrict the ability of the FHLBank to serve local communities.

Sincerely,

Daniel G. Drane