



HOMELAND, INC.

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"STRIVING FOR EXCELLENCE IN AFFORDABLE HOUSING"

www.homelandinc.com

PROPERTY MANAGEMENT SERVICES

July 3, 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 Homeland Inc., an organization providing housing services for clients such as Elderly, Tax Credit, HUD and Family complexes. My organization has partnered with the FHLBank to provide 2551 units valued at 160 million dollars located in various locations in Kentucky. I have attached a list of the FHLBank properties that we have.

FHLBank funding is often the critical first level of financial commitment to our projects. It helps leverage other sources of public and private funding and bring together the necessary partners and leaders for effective development. As the highly successful Affordable Housing Program is based on an 10 percent set-aside of annual net profits, we all have a stake in the success and profitability of the FHLBank.

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, and increase costs to its members. All to no apparent benefit. Why penalize the FHLBank member lenders, housing partners and our at-risk clients? 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 decent housing.

Sincerely,

A handwritten signature in black ink, appearing to read "David Zurmehly", is written over a circular stamp or seal.

David Zurmehly, President
Homeland Inc.

cc: Garry Watkins, General Partner

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TDD# 1-800-545-1833, Ext. 336 (Hearing Impaired Only)

FHLBank Properties	FHLB	#units	type	city
Abby Ridge	X	24	T/C -FAMILY	ELIZABETHTOWN, KY
Adams Station	X	16	T/C -FAMILY	BOWLING GREEN, KY
Allison Apartments	X	24	T/C -FAMILY	MT. WASHINGTON, KY
Alumni	X	24	T/C-55 OLDER	CORBIN, KY
Angela Homes	X	24	T/C -FAMILY	SHEPHERDSVILLE, KY
Ashberry	X	24	T/C -FAMILY	BARDSTOWN, KY
Austin Acres	X	32	T/C -ASST. LVING	HOPKINSVILLE, KY
Baptist Town	X	14	T/C -FAMILY	OWENSBORO, KY
Bard Homestead	X	40	RD-T/C/FAMILY	BARDSTOWN, KY
Bohannon Place	X	12	T/C -FAMILY	BOWLING GREEN, KY
Brittney Square	X	20	T/C -FAMILY	BOWLING GREEN, KY
Brooks Run	X	56	T/C -FAMILY	LOUISVILLE, KY
Cave Valley	X	29	T/C-55 OLDER	HAWESVILLE, KY
Claire Village	X	30	FAMILY	ELIZABETHTOWN, KY
Clay St	X	16	FAMILY	HAWESVILLE, KY
Clayton Station	X	29	T/C-55 OLDER	MUNFORDVILLE, KY
County Farms	X	24	T/C-55 OLDER	LONDON, KY
Dawn Springs	X	24	T/C-55 OLDER	LONDON, KY
Day Star	X	33	T/C-ELDERLY	BOWLING GREEN, KY
Double Springs I	X	24	T/C-ELDERLY	BOWLING GREEN, KY
Double Springs II	X	25	T/C-ELDERLY	BOWLING GREEN, KY
Eastern Heights I (Duplex)	X	46	T/C -FAMILY	BOWLING GREEN, KY
Emma Estates	X	34	T/C -FAMILY	LONDON, KY
Garden Grace	X		T/C -FAMILY	BOWLING GREEN, KY
Gilbert	X	40	T/C -FAMILY	CORBIN, KY
Grant	X	32	T/C-55 OLDER	OWENSBORO, KY
Henderson II	X	30	T/C -FAMILY	HENDERSON, KY
Hillside	X	48	HUD-T/C FAMILY	CYNTHIANA, KY
Lakeview Station	X	28	T/C	SHEPHERDSVILLE, KY
London Town	X	24	T/C -FAMILY	LONDON, KY
London Village	X	32	T/C-55 OLDER	LONDON, KY
Lorie Village	X	32	T/C-55 OLDER	BOWLING GREEN, KY
Marilyn Heights	X	40	T/C-ELDERLY	MT. WASHINGTON, KY
Morning Sun	X	30	T/C -FAMILY	BOWLING GREEN, KY
Mt. Washington Place	X	32	T/C-ELDERLY	MT. WASHINGTON, KY
Northwood Homes	X	24	T/C -FAMILY	LEITCHFIELD, KY
Paris Place	X	32	T/C -FAMILY	PAIS, KY
Parkland Manor	X	32	T/C-55 OLDER	LEITCHFIELD, KY
Pear Village	X	16	T/C -FAMILY	LEITCHFIELD, KY
Renaissance	X	34	T/C-55 OLDER	BOWLING GREEN, KY
Reno	X	40	T/C-MIXED	ELIZABETHTOWN, KY
Reno II	X	16	T/C-ELDERLY	ELIZABETHTOWN, KY
Sand Lane	X	24	T/C-ELDERLY	HENDERSON, KY
Sandy Hill	X	29	T/C-55 OLDER	CENTRAL CITY, KY
School House	X	40	T/C	CORBIN, KY
Southbrook	X	24	T/C-FAMILY	LONDON, KY
Starlite	X	40	T/C-55 OLDER	ELIZABETHTOWN, KY
Sunday Sun	X	30	T/C -FAMILY	BOWLING GREEN, KY
Sunnydale	X	49	T/C -FAMILY	BOWLING GREEN, KY
Sunshine Village	X	32	T/C-55 OLDER	ELIZABETHTOWN, KY