

State Bank of Downs



Serving all of your banking and insurance needs since 1892.

September 22, 2009

Alfred M. Pollard, Esq.
General Counsel
Federal Housing Finance Agency
Fourth Floor
1700 G. Street N.W.
Washington, D.C. 20552

Dear Mr. Pollard,

I am writing in regard to the Notice of Proposed Rulemaking published in the *Federal Register* August 4, 2009. I have reviewed and strongly support the comment letter filed by the Federal Home Loan Bank of Topeka dated September 18, 2009. I urge you to move forward with issuing a final regulation.

I support the concept of an Office of Finance board of directors composed of all 12 Federal Home Loan Bank presidents and from three to five independent directors. I believe that the Office of Finance board of directors should be responsible for: (1) the issuance of System debt; (2) the issuance of System combined financial reports, including ensuring appropriate accounting consistency across the FHL Banks; and (3) monitoring and imposing appropriate limits on the risk profiles of the Federal Home Loan Banks. In order to achieve these responsibilities, the Office of Finance board of directors should have the power to limit the issuance of System debt.

I also support the concept of an audit committee composed entirely of independent directors. While I support reasonably consistent accounting across the Federal Home Loan Banks, I do not agree with giving the responsibility for the issuance of accounting guidance to the audit committee of the Office of Finance board of directors. The full board should have that responsibility. The responsibility of the audit committee should be limited to reviewing the disclosures and making a determination that accounting consistency across the Federal Home Loan Banks is sufficient to issue System combined financial reports.

Thank you for the opportunity to comment.

Sincerely,

Bill D. Berkley, President
bdb/sm



900 N. MORGAN - DOWNS, KANSAS 67437

PH. 785-454-3323

FAX. 785-454-3560

