

From: Liz Hersh [mailto:liz@housingalliancepa.org]
Sent: Thursday, September 14, 2006 11:10 AM
To: Comments
Subject: Comments on RIN number 3064-AD09

Thursday, September 14, 2006

Mr. Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW.,
Washington, DC 20429

Dear Mr. Feldman:

We are opposed to the proposed FDIC rule to categorize FHLBank advances as "volatile liabilities."

The Housing Alliance of Pennsylvania is a statewide membership organization that works for a home within reach of every Pennsylvanian. This proposal would reduce available resources from an effective, well-respected source for the development of affordable homes, FHLBanks AHP. In fact, the advances are not volatile, but quite stable. This is an erroneous and ill-advised regulatory barrier being imposed by the government.

We urge you to reject the proposed change. FHLBank advances should not be a factor in assessing FDIC premiums.

Thank you for your consideration.

Sincerely,

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Working for a home within reach of every Pennsylvanian