



FEDERAL HOME LOAN BANK OF INDIANAPOLIS



March 26, 2007

Building Partnerships.
Serving Communities.

Communications Division
Public Information Room, Mail Stop 1-5
Office of the Comptroller of the Currency
250 E Street, S.W.
Washington, DC 20219
Docket No. 06-15

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, N.W.
Washington, DC 20552
Docket No. 2006-49

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal
Reserve System
20 Street and Constitution Ave., N.W.
Washington, DC 20551
Docket No. R-1238

Robert E. Feldman, Executive Secretary
Federal Deposit Insurance Corp.
550 17Street, N.W.
Washington, DC 20429
RIN No. 2064-AC96

Re: Risk-Based Capital Guidelines; Capital Adequacy Guidelines;
Capital Maintenance: Domestic Capital Modifications
71 Fed. Reg. 77446 (December 26, 2006)

Dear Sir or Madam:

The Federal Home Loan Bank of Indianapolis is submitting this comment letter to bring to your attention an important issue raised by the Basel I-A notice of proposed rulemaking.

Under the existing risk-based capital framework (Basel I), the risk weight assigned to exposures issued or guaranteed by a Government Sponsored Enterprise (GSE), such as a Federal Home Loan Bank, is 20 percent. The preamble in the Basel I-A notice of proposed rulemaking¹ notes that two GSEs – Fannie Mae and Freddie Mac – as part of an agreement with their regulator, obtain and disclose credit ratings issued by a Nationally Recognized

¹ 71 Fed. Reg. 77446 (December 26, 2006).

