



November 27, 2002

Elaine L. Baker  
Secretary to the Board  
Federal Housing Finance Board  
1777 F Street  
Washington, DC 20006

Dear Secretary Baker,

The Board of Directors of the FHLBank of Des Moines appreciates the opportunity to submit our views to you in connection with the public forum the Federal Housing Finance Board is holding on December 2, 2002. The topic of the hearing "FHLBank Views Concerning Regulations of FHLBank Stock Under the Securities Exchange Act of 1934" is one that was deliberately and extensively discussed at our Board meeting November 20, 2002.

Our Board of Directors strongly supports enhanced public disclosure where it is appropriate. We also strongly believe that jurisdiction regarding the review and enforcement of the FHLBanks' securities disclosures must, to promote the safety and soundness and the statutory mission of the FHLBank System, remain with the Finance Board, where Congress intended it to be. We have complete confidence in the Finance Board's ability to exercise its plenary regulatory authority over the FHLBank System to create an excellent and continually evolving disclosure regime.

It is our understanding that the FHLBank presidents will be submitting detailed written testimony to the Finance Board and that three presidents will be providing oral summaries of the written testimony at your December 2<sup>nd</sup> meeting. Our Board fully supports the unified position of the FHLBank presidents.

The Finance Board has been diligent in developing the FHLBank System's disclosure regime and we commend the Finance Board for their efforts to now enhance and improve the FHLBank System's financial disclosures. However, there is no compelling reason to delegate any disclosure responsibilities to another regulator and risk diluting the ability of the Finance Board to perform its role as the safety and soundness regulator of the FHLBank System.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Dale J. Torpey  
Chairman