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Honorable Edwin J. Gray Chairman Fudaral Home Loan Bank Board 1700 G Street, N.W. Washington, D.C. 20550

Dear Edvin,

I am writing to express my concern over the Board's Resolution 84-237 and to request that you defer adoption of the proposed rule which would impose limits on the ability of FSLIC-insured state chartered savings and loan associations to invest in real estate, service corporations and equity securities.

While a number of states have substantially deregulated the direct investment restrictions on state chartered savings and loans, the Internal Revenue deductions based upon each thrift's maintaining a 60% level of mortgages remain as an incentive for thrifts to remain in the mortgage business. While I appreciate the Board's concern over the risk to the FELIC insurance fund from these new activities, it appears that the FELIS's broad resolution vill substantially reduce the power of states and state regulators under the dual banking system and may be a question that should be more appropriately decided by Congress.

Therefore, I urge that you defer adoption of the proposed rule until Congress and affected institutions have had an opportunity for greater consideration of this subject.

With best wishes,

EXHIBIT SC-GY 31

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