



January 14, 2020

The Honorable Joseph Otting
Comptroller
Office of the Comptroller of the Currency
400 7th Street SW, Suite 3E-218
Washington, DC 20219

The Honorable Jelena McWilliams
Chairman
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429-0002

RE: Docket ID OCC-2018-0008; RIN 1557-AE-34, 3064-AF22; - Reform of the Community Reinvestment Act

Dear Comptroller Otting and Chairman McWilliams:

On behalf of the undersigned banking trade associations, we urge you to extend the 60-day deadline of March 9, 2020 for public comment on the proposed rule to amend the Community Reinvestment Act (CRA). Specifically, we ask you to extend the date to allow for a 120-day comment period.

We fully appreciate the efforts of the agencies to update CRA for the first time in decades. We are excited about the opportunity to work with you to ensure that CRA works for the banking industry and the communities our members serve. Collectively our organizations represent the thousands of banks and thrifts across the United States – many of which are the smallest banks in the industry.

Updating CRA to reflect the current evolution of the banking industry is important to our membership. We are, however, concerned given the complexity of the proposed rule that the current 60 day comment period is not an adequate amount of time to work with our members to analyze, assess and understand how the rule will affect their operations and strategies for serving their communities.

To this end, we respectfully ask you to extend the date to allow for a 120-day comment period.

Thank you for consideration of this request.

Sincerely,

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Association
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Independent Community Bankers of
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National Association of Affordable Housing
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National Bankers Association
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