

GBA
GEORGIA BANKERS ASSOCIATION
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Aug. 3, 2022

James P. Sheesley
Assistant Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
Attention: Comments RIN 3064–AF81 C

Chief Counsel's Office
Office of the Comptroller of the Currency
400 7th Street SW Suite 3E–218
Washington, DC 20219
Attention: Comment Processing, Docket ID OCC—2022-0002

Ann E. Misback
Secretary Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
Attention: Comments Docket R-1769; RIN 7100-AG29

Re: Community Reinvestment Act Regulations, Docket ID OCC–2022-0002

Dear Madam or Sir:

On behalf of the members of the Georgia Bankers Association, I write regarding the joint proposal on Community Reinvestment Act regulations issued by the agencies. Thank you for your leadership and hard work in drafting this proposal. This needed update will greatly enhance our communities as technology and the financial services industry continue to evolve.

First, thank you for your sincere effort to tailor the proposal for small, intermediate and large size banks. Limiting new data collection for smaller institutions is vitally important. However, I'm told that the new Retail Lending Assessment Areas (RLAAs) are a significant pain point for larger institution. Keeping the RLAA's will make CRA compliance extremely complex as banks will need to add a significant number of new assessment areas. Evaluating out-of-footprint lending at the institution level should satisfy the goals for evaluating lending beyond facility-based assessment areas and would still represent a significant expansion of the current evaluation process but in a manageable way.

We appreciate the provisions of increased transparency and certainty regarding community development including the proposed preapproval process and list of qualifying activities for community development. This includes the important lending through the Small Business Administration's Development Company Program (SBDC).

And, one final note in the proposed implementation timeline. We heard from several institutions who request that a minimum of 2 years be given in order to comply with some of the more complex components of the proposal.

Thank you for the opportunity to share our thoughts on this important matter.

Sincerely,



Joe Brannen
President & CEO