



September 18, 2007

Office of the Comptroller of the Currency  
250 F. Street, SW, Mail Stop I-5  
Washington, DC 20219  
[Regs.comments@occ.treas.gov](mailto:Regs.comments@occ.treas.gov)  
Docket ID OCC-2007-0012

Mr. Robert E. Feldman, Executive Secretary  
Attention Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429  
[Comments@FDIC.gov](mailto:Comments@FDIC.gov)

Ms. Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551  
[Regs.comments@federalreserve.gov](mailto:Regs.comments@federalreserve.gov)  
Docket No. OP-120-90

Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552  
[Regs.comments@ots.treas.gov](mailto:Regs.comments@ots.treas.gov)  
ID OTS-2007-0030

Re: Community Reinvestment Act; Interagency Questions and Answers  
Regarding Community Reinvestment: Notice: OCC-2007; OP-1290; RIN 3064-  
AC97; and OTS-2007-0030

Ladies and Gentlemen:

Neighborhood Lending Partners (NLP) is a nonprofit lending consortium serving the State of Florida. NLP is pleased to submit comments on the above referenced Q&A. NLP has been financing affordable housing and economic development in underserved neighborhoods since 1993 with the support of our member financial institutions who supply us with loan pool commitments to provide for our lending products. In the past 15 years, NLP has financed over 10,000 units of affordable housing, and closed loans in excess of \$300,000,000.

NLP's primary concern with the proposed Q&A is that it leaves open the possibility of examiners' discounting investments in national, regional and statewide lending consortia and other community development funds. Multi-investor, multi-geography funds play a critical role in providing affordable housing to low- and moderate-income families across the State of Florida. Since the formation of NLP, banks have pooled their money in this consortium in order to meet the affordable housing needs of their communities. These

pools afford banks real economies of scale, and the opportunity to utilize experts in originating, underwriting and servicing of affordable housing loans, as well as gain the benefits of geographic and product diversification.

We strongly support the existing CRA guidance on investments in broad geographic lending funds, which states that:

"The institution's assessment area(s) need not receive an immediate or direct benefit from the institution's specific participation in the broader organization or activity, provided that the purpose, mandate or function of the organization or activity includes serving geographies or individuals located within the institution's assessment area(s)."

That Q&A specifically recognizes that community development organizations and programs are efficient and effective ways for institutions to promote community development; that these organizations and programs often operate on a statewide or multi-state basis; and therefore, an institution's activity is considered a community development loan or investment if it supports an organization or activity that covers an area that is larger than, but includes, the institution's assessment area.

### **RECOMMENDATION**

NLP recommends strongly that a bank should continue to receive full CRA credit for the entire dollar amount of its investment in national, statewide and regional funds that make community development loans or investments, generally as defined under the CRA rules, regardless of the location of the fund's projects, provided that some of the fund's projects are located in the bank's assessment area(s) or broader statewide or regional area that includes the bank's assessment area(s).

Please contact me with any questions concerning the foregoing.

Sincerely,



Debra S. Reyes  
President & CEO

cc: Ms. Judith Kennedy, NAAHL