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July 30, 2009

Office of the Comptroller of the Currency
250 E. Street, S.W.
Mail Stop 2-3
Washington, DC 20219
Docket No. OCC-2009-0010

Jennifer J. Johnson
Secretary
Board of Governors of the Federal
Reserve System
20th Street and Constitution Avenue, N.W.
Washington, DC 20551
Docket No. R-1360

Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, DC 20429
RIN 3064-AD45

Regulations Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, N.W.
Washington, DC 20552
Attention: OTS-2009-0010

RE: Community Reinvestment Act Regulations; Joint Notice of Proposed Rulemaking


Dear Sir or Madam:

Citibank, N.A. appreciates the opportunity to comment on this joint notice of proposed rulemaking ("Proposal") under the Community Reinvestment Act (CRA). Citibank, through its subsidiary, Student Loan Corporation, is a leading provider of FFEL and private student loans.

Citibank supports the positions taken by The Consumer Bankers Association (CBA) in its letter to the Agencies on the Proposal. We fully support the goals of encouraging financial institutions to provide affordable educational loans to low income borrowers, and we believe that the suggestions made by the CBA in its letter will serve to make the revisions to the Community Reinvestment Act ("CRA") enacted by the Higher Education Opportunity Act workable for the financial institutions that are subject to the CRA in a way that will incent them to make such loans.

We thank you again for this opportunity to comment on the Proposal. If you have any questions or would like to discuss this further with Citibank, please do not hesitate to contact Edward Handelman at (212) 559-2363, or the undersigned at (212) 559-2938.

Very truly yours,

A handwritten signature in black ink, appearing to read "Carl V. Howard". The signature is fluid and cursive, with the first name "Carl" being particularly prominent.

Carl V. Howard
Deputy General Counsel