

From: [REDACTED]
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] Timely comment, Economic Growth and Regulatory Paperwork Reduction Act of 1996 (EGRPRA)
Date: Wednesday, October 22, 2025 11:36:09 PM

October 22, 2025

Jennifer M. Jones Deputy Executive Secretary Attn: Comments - EGRPRA Federal Deposit Insurance Corporation 550 17th Street, NW Washington DC 20429

[Ann E. Misback Secretary Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue, NW Washington, DC 20551 Docket No. OP-1828

Chief Counsel's Office Attn: Community Processing Office of the Comptroller of the Currency 400 7th Street, SW, Suite 3E-218 Washington, DC 20219 Docket ID OCC-2023-0016]

RE: Economic Growth and Regulatory Paperwork Reduction Act of 1996 (EGRPRA), Docket ID OCC-2023-0016 and Docket No. OP-1828

To Jennifer M. Jones Deputy Executive Secretary, FDIC:

Fair Finance Watch submits these timely comments, under the rubric of ERGPRA, on the agencies' recent moves to reduce and even eliminate public notice and public comment.

We'll begin with issues we raised, or have attempted to raise, to the Office of the Comptroller of the Currency on one of its deregulatory moves. Tellingly, this proposal contrary to the notice on the OCC website was not on Regulations dot gov, and an email to the OCC was returned with the suggestion to only submit it through regulations dot gov. So here goes:

Re the OCC's proposal OCC-2025-0273

The Community Reinvestment Act specifies that "the appropriate Federal financial supervisory agency shall (1) assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the safe and sound operation of such institution; and (2) take such record into account in its evaluation of an application for a deposit facility by such institution."

That is, the only enforcement mechanism of CRA is its consideration on applications for deposit facilities: branches.

But now the OCC proposes to make the process of public notice, public comment and CRA review nearly meaningless.

It is already toothless. On August 30, 2025 Fair Finance Watch commented to the OCC on / against the branching application of Terrabank NA noting that this national bank in Florida in 2024 made 30 mortgage loans to whites and NONE to African Americans.

On September 2 the OCC's Danielle Larrimore, Licensing Specialist, sent acknowledgement of receipt. In the 34 days since, nothing from the OCC - this while on a similarly commented on FRB application, the Fed has sent two additional information letters, copying Fair Finance Watch, including on CRA.

The OCC proposes to further speed up the public process - this while the OCC is now automatically denying Inner City Press' requests for expedited treatment of its FOIA request for applications.

It is now proposed that bank need not even apply. How is the public to get notice, and comment if necessary, if there is no information about the

proposal?

Tellingly, despite the OCC's October 6 press release and notice, the proposal does not show up of 11 pm on October 6, so this is being emailed to [REDACTED] who sent a recent FOIA appeal denial, from the O [REDACTED] TERNAL LAW section.

See, American Banker, Sept 10, 2025, "The FDIC is taking the 'community' out of CRA enforcement," by Matthew R. Lee, <https://www.americanbanker.com/opinion/the-fdic-is-undercutting-a-key-element-of-the-cra>

This OCC proposal to significantly limit public notice and comment on branch applications must be withdrawn. The FDIC's proposal should be withdrawn. And the Federal Reserve, unlike its recent moves on FOIA request(s) by Inner City Press, should not follow these two down the path of contempt for the public.

The request for comment asks, among other things, to "indicate how they should be amended."

Given recent statements about the CFPB, Fair Finance Watch has asked the FRB, and asks the agencies here, to ensure uninterrupted public access to HMDA data, which was moved to CFPB.

While the entire focus seems to be reducing regulation and oversight, recent moves by some in the crypto currency industry will require more, not less, oversight. The OCC's rush to rubberstamp, for example, the application of Erebor, their approval of a protested branch application by Terrabank without even providing notice much less a rationale to the commenter (FFW), bode badly for safety and soundness and consumer protection with their new digital bank charters. Thus, deregulatory EGRPRA "review" seems in context to be a scam, a parlor debate while the public is being excluded. There will be more comments and advocacy, not less. As there much be.

The FDIC's and OCC's recent proposals, and the FRB's recent moves, must be reversed.

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