



December 26, 2017

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
400 7th Street SW
Washington, DC 20219

**Re: Notice of Proposed Rulemaking: Docket ID OCC–2017–0018
Simplifications to the Capital Rule Pursuant to the Economic Growth and Regulatory
Paperwork Reduction Act of 1996**

Dear Madam or Sir:

Self-Help Ventures Fund (“Self-Help”), a US Small Business Administration (“SBA”) 504 program Certified Development Company (“504 CDC”), appreciates the opportunity to comment on the Notice of Proposed Rulemaking entitled “Simplifications to the Capital Rule Pursuant to the Economic Growth and Regulatory Paperwork Reduction Act of 1996.” Self-Help, a community development financial institution founded in the early 1980’s, received our certification under the SBA 504 Development Company program in 1993. Since that time, we have originated and/or serviced approximately 600 SBA 504 loans to small businesses, totaling over \$275 million in financing under the program. These small businesses have been able to expand and grow, and have created or retained over 8,500 jobs as a result of the SBA 504 Development Company program.

Self-Help is a member of the National Association of Development Companies (“NADCO”), the trade association of SBA 504 CDCs. Self-Help has reviewed the comments to Docket ID OCC–2017–0018 that have been submitted by NADCO, and believes NADCO’s comments represent the industry and are in the best interests of small businesses. Like NADCO, Self-Help believes it is important to provide clarity that the proposed community development exemption applies to interim construction loans provided by banks to small business borrowers under the 504 Development Company program. The changes to the Capital Rule suggested by NADCO will allow for continued economic growth and job creation in the small business sector through the SBA 504 Development Company program. As such, Self-Help fully supports NADCO’s comments to Docket ID OCC–2017–0018.

Thank you for your consideration of these comments.

Sincerely,

Tracy C. Ward
Director, SBA 504 Loan Program/VP