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Federal Deposit Insurance Corporation
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Via email: comments.applications@rich.frb.org

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Comments on concerns raised by the proposed merger of BB&T and Suntrust as it relates to access for people with disabilities

Disability Rights NC is the designated protection and advocacy agency dedicated to advancing the rights of people with disabilities. We are an independent 501(c)(3), and our work spans the entire state. Disability Rights NC and our sister network of protection and advocacy agencies are keenly aware of the importance of these financial institutions and the potential impact of the proposed merger on people with disabilities and urge your consideration of this impact as analyze this merger's public benefit.

As advocates for people with disabilities, we ask that you consider the impact in retail banking, home lending, and business lending for people with disabilities. On the retail banking front, it is essential that any consolidation plan preserve branches that are accessible by public transit, and also protect and expand drive through hours at remaining branches. We recognize the pressures that have led to significant consolidation among financial institutions, but we must ensure that further consolidation does not take banking out of the reach of people with disabilities.

In addition to physical branches, it is important that the consolidated entity make its web presence more accessible. We have reviewed both banks' websites under section 508 standards, and have found inaccessible features in both. Since there will certainly be an investment in updating the web presence of any consolidated entity, we call on you to require that new website meet high accessibility standards.

Housing finance accessibility means making lending for home modifications available. Housing stock in our state is largely inaccessible for people with a variety of disabilities. Access to capital is essential for both homeowners needing to adapt an existing home in the face of a newly acquired disability and for the purchase of a home that may not yet be physically accessible to a home buyer with an existing disability. This is why we urge the consolidated entity to continue to offer FHA loans and to expand their program to include the FHA 203(k) loan product which can be used for the modification and purchase of existing housing stock. We also encourage the consolidated entity to participate in the VA Home Loans for Disabled Veterans program and the USDA loan programs.

Second, it is essential that multifamily development lending ensure accessibility. Accessibility in this context means more than just architectural accessibility. For example, It is also important that people with disabilities not experience discrimination in housing based on credit and criminal history that are a product of their disability. We would be happy to work with these and any financial institution to ensure that their lending helps to guarantee accessibility to renters with disabilities.

We believe business lending should be prioritized for entrepreneurs with disabilities. Just as housing discrimination is a factor in our clients' lives, so is employment discrimination. For many people with disabilities the only way to make a living without being subject to the whims of other people's biases is to own their own business. We encourage expansion of investments in lending and technical support.

Finally, we are encouraging these financial institutions to further the accessibility of our communities would be direct funding of advocacy to ensure that all financial institutions are working toward accessibility in addition to their admirable historical investment in funding of services and lending.

Thank you for the opportunity to share our concerns regarding the impact of the proposed merger on access to capital and banking services for people with disabilities.

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