

August 4, 2022

BY ELECTRONIC TRANSMISSION

Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th St., and Constitution Ave., N.W.
Washington, D.C. 20551

Chief Counsel's Office
ATTN: Comment Processing
Office of the Comptroller of the Currency
400 7th Street, S.W., Suite 3E-218
Washington, D.C. 20219

James P. Sheesley, Assistant Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W. Washington, D.C. 20429

RE: Question 13, Economic Development, and Community Reinvestment Act Regulations Docket (R-1769) and RIN (7100-AG29)

To whom it concerns:

Range Beauty, Inc. appreciates the opportunity to comment on the proposal by the Board of Governors of the Federal Reserve System for feedback on different approaches to modernizing the regulatory and supervisory framework for the Community Reinvestment Act (CRA).

Range Beauty, Inc. is writing to respond to the request for feedback on Question 13 from the Notice of Proposed Rulemaking ("NPR") by urging the Regulating Agencies (OCC, FRB, and FDIC) to retain the ability of banks to receive CRA credit via the "size and purpose test" for lending to or investing in financial intermediaries that finance small businesses with revenue greater than \$5M.

As a Black woman-founded company, the capital we received was instrumental in scaling us from a home-operated business to a full-fledge company. The funding enabled an overhaul of our operations, marketing, technology, and supply chain in under a year. The capital allowed us to rebrand our packaging and expand our brand awareness, which brought on retail success and generated further revenue. When other funds declined their support, spotlighting the disparities in funding for Black women founded businesses, a CRA supported fund recognized Range Beauty as deserving of capital and growth opportunities. This set the tone for other investors to feel comfortable joining our cap table. The funding allowed us to expand our team and bring on crucial first hires who are needed to help ensure the success rate of an emerging brand. This truly would not have occurred without the backing we received through resources, new partnerships, and capital provided by the fund. 20% of Black businesses fail within the first year, 30% within the second, and 50% within the third. CRA supported funds are needed specifically for BIPOC founded companies to scale, create more jobs, and pour back into the economy and communities.

We believe it is crucial to keep the current definition of "size" test standards and to retain and even expand the categories that qualify for "economic development" currently set forth in the CRA Interagency Q&A. Keeping these measures in place and possibly making it easier for bank partners to qualify for CRA credit will continue to lead to significant job creation, revenue generation, and the continued increase in the hiring of LMI employees and subsequent graduation from the LMI thresholds.

Range Beauty, Inc. would be happy to provide any additional information helpful to the Board, or to meet in person to discuss or share our data and template we have created.

Sincerely,



Range Beauty, Inc.