

**From:** Nicole Reed  
**To:** [Regs.Comments](#)  
**Subject:** [EXTERNAL] Capital Rule Pursuant to the Economic Growth and Regulatory Paperwork Reductions Act of 1996'---  
identifying number Docket ID OCC-2017-0018.  
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**To the Capital Rule Pursuant to the Economic Growth and Regulatory Paperwork Reductions Act of 1996'**

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In the new proposed rule, HVCRE has been renamed "High Volatility Acquisition, Development, and Construction (HVADC), changes have been made in the loss reserve requirements, and **most important for the 504 program, the 504-related interim construction loans have been given the exception to the new HVADC rule.**

I AM VERY MUCH in support of this proposed rule. 504 projects have construction loans tied to them. Lenders' construction loans should be exempt from the HVCRE classification because these loans are intimately linked to the take-out 504 loans, and therefore part of the overall community development investments.

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