



April 16, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

Federal Deposit Insurance Corporation
Atlanta Regional Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849

RE: Proposed Merger of BB&T, SunTrust

To Whom it May Concern:

I have been asked to provide comments regarding the proposed merger of BB&T and SunTrust, and in particular, our experience with BB&T as it relates to the bank's record of support for community development projects.

Centrant Community Capital is a wholly-owned subsidiary of the North Carolina Bankers Association, created in 1990 to offer permanent mortgage loans to finance affordable multifamily housing. To date, we have provided over \$400 million in funding commitments to finance 23,000 units in six Southeastern states. As a lending consortium, all of the funding for our loans is provided by a network of nearly 100 member banks via voluntary, loan-by-loan participation commitments.

Since joining our consortium in 1993, BB&T has been one of Centrant's most consistent and supportive members. In total, BB&T has provided over \$37 million in funding for our loans, helping to finance the creation or preservation of thousands of affordable apartment units in over 230 properties across our lending footprint. I am pleased to report that BB&T also supports these developments via tax credit equity investments, and as a construction lender.

Without the support of financial institutions such as BB&T, it would not be possible for Centrant to provide the financing that we offer. We appreciate BB&T's long-standing support of our organization, and applaud its demonstrated commitment to community development efforts in the markets that we serve together.

Sincerely,



David R. Bennett
Executive Vice President