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GCS | SIGAL

Michael Sigal
GCS | SIGAL

Rev. Stephen Tucker
JOBS Coalition

April 19, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, Virginia 23161
comments.applications@rich.frb.org

Federal Deposit Insurance Corporation
Ten 10th Street, N.W., Suite 800
Atlanta, Georgia 30309-3849
BankMergerApplication@fdic.gov

Re: Proposed Merger of BB&T Bank and SunTrust Bank

Ladies and Gentlemen:

EXECUTIVE COUNCIL

William Alsop
Hines

Giuseppe Cecchi and Norman Dreyfuss
IDI Group Companies

Jim Davis
DAVIS Construction Corporation

Paul Elias
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LCOR Incorporated

Douglas Jemal
Douglas Development Corporation

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Boston Properties, LP

Chris M. Pappas and C. Michael Pappas
Telligent Masonry, LLC

Edward J. Quinn, Jr.
TW Perry, Inc.

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Stanley W. Slotter & W. Clarke Ewart
Paradigm Contractors, LLC

Todd Stokes
Baker Tilly

Justin Sullivan
Impact Construction & Consulting

William A. Thompson, III
Hensel Phelps Construction Company

Scott Vossler
WCS Construction, LLC

Shelton Zuckerman
Zuckerman Gravely Development, Inc.

The District of Columbia Students Construction Trades Foundation (“Foundation” or “DCSCTF”) (<http://dcstudentsctf.org/>) is pleased to submit these written comments to the Federal Reserve Bank of Richmond and the Federal Deposit Insurance Corporation Regional Office of Atlanta, Georgia, in connection with the proposed merger of BB&T Bank and SunTrust Bank.

Established in 2005, the Foundation is a partnership of business and community leaders primarily located in the District of Columbia region (<http://dcstudentsctf.org/foundation/leadership.htm>) whose objective is to return and support skilled trades learning to public schools and generate renewed interest in career and technical education (CTE) as a viable pathway to work, college and careers. DCSCTF has designed three programs around this objective: the Academy of Construction and Design (ACAD); the DC Apprenticeship Academy; and Adult Education.

The ACAD program has been and is co-located with the public schools of the District of Columbia. Currently housed at the IDEA Public Charter High School in Ward 7, ACAD presents its skills training efforts through a series of instructional modules approved by the National Center for Construction Education and Research (NCCER). Its curriculum is equivalent to Level 1 pre-apprenticeship training and is offered to students in grades 10-12, as well as introductory classes and activities for ninth graders.

One of the key features distinguishing the Academy of Construction and Design is its hands-on skills project “*Build a House – Build a Future.*” Begun in 2010, the program includes construction of a house by the students under the supervision of industry tradesmen/tradeswomen employees of leading industry training partners. Through this program, Academy students constructed a 2,000 square-foot, single-family house sold at market rate as well as two micro homes featured in a recent demonstration project with the DC Department of Housing and Community Development showcasing the possibilities of “tiny house” construction and sustainable living.

ADVISORS

Roderic L. Woodson
Leftwich LLC

Carol Randolph
Co-Founder, Academy of Construction and Design

STAFF

Paula Ralph
Chief Operating Officer

Beth Moore
Program Director

Shelly Karriem
Academy Director



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April 19, 2019 -- page 2
Letter to Federal Reserve Bank of Richmond and Federal Deposit Insurance Corporation

Our DC Apprenticeship Academy offers “related instruction” (i.e., required classroom curriculum) for apprentices who are currently employed in the construction industry and registered with the DC Office of Apprenticeship Information and Training. Additionally, the Foundation provides technical assistance and instructor certification to nonprofit organizations offering pre-apprenticeship adult job training in the Washington D.C. area.

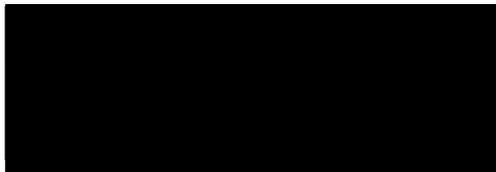
The Foundation believes Career and Technical Education (or vocational education) is a much-needed opportunity for young people nationwide *and particularly in urban school settings*. Continued adherence to the all-too-familiar mantra of “college for everyone”, so often purveyed as the universal goal in most academic circles, marks a disservice to the eighty percent of high school graduates who will follow alternate paths to postsecondary credentials. We must also concern ourselves with helping students translate their demonstrated aptitudes into gainful employment. Skilled trades offer pathways to such gainful employment and need to be encouraged.

The programs of instruction presented by the Foundation offer the early pathways to gainful employment and profitable careers which can carry on for a lifetime. All of these programs from the Foundation are being advanced through the generous support of SunTrust Bank through its Community Reinvestment Act undertakings. This support from SunTrust points to their understanding of the need to advance a more expansive educational opportunity for young people through Career and Technical training in our communities – and it fits squarely within the statutory obligation for community reinvestment.

The Foundation hopes and trusts that this understanding by SunTrust will continue to occupy a place of attention and action within the combined banking entity being considered in this merger.

Accordingly, the DC Students Construction Trades Foundation gives our strongest endorsement and support to the SunTrust/BB&T merger.

Sincerely,



John M. McMahon
President

