



1120 Connecticut Avenue, NW
Washington, DC 20036

1-800-BANKERS
www.aba.com

*World-Class Solutions,
Leadership & Advocacy
Since 1875*

Paul A. Smith
Senior Counsel
Phone: 202-663-
5331
Fax: 202-828-4548
psmith@aba.com

April 3, 2006

Delivered via e-mail

Public Information Room
Office of the Comptroller of the
Currency
250 E Street, SW, Mailstop 1-5
Washington, DC 20219
regs.comments@occ.treas.gov

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
comments@fdic.gov

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal
Reserve System
20th Street & Constitution Ave., NW
Washington, DC 20551
regs.comments@federalreserve.gov

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552
regs.comments@ots.treas.gov

**Re: EGRPRA Burden Reduction: Prompt Corrective Action and
Disclosure and Reporting of CRA-Related Agreements; FDIC 12 CRF
Chap. III; FRB Docket No. R-1243; OCC Docket No. 05-22: OTS No.
2005-53; 71 Federal Register 287; January 4, 2006.**

Ladies and Gentlemen:

Section 2222 of the Economic Growth and Regulatory Paperwork Reduction Act of 1996 (EGRPRA) requires federal banking agencies (Agencies) to review their regulations at least once every 10 years. The Agencies in Round Six of the review are asking for comments on the ways in which the laws and regulations relating to the Community Reinvestment Act Sunshine Act and Prompt Corrective Action may be outdated, unnecessary, or unduly burdensome. These laws and regulations may affect all commercial banks and savings associations. The American Bankers Association, on behalf of the more than two million men and women who work in the nation's banks, brings together all categories of banking institutions to best represent the interests of this rapidly changing industry. Its membership--which includes community, regional and money center banks and holding companies, as well as savings associations, trust companies and savings banks--makes ABA the largest banking trade association in the country.

Community Reinvestment Act Sunshine Act

Section 711 of the Gramm-Leach-Bliley Financial Modernization Act of 1999 (the CRA Sunshine Act) enacted a requirement that nongovernmental entities or persons, insured depository institutions, and affiliates of insured depository institutions that

