



November 7, 2014

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street NW  
Washington, DC 20429

Dear Mr. Feldman:

Thank you for the opportunity to comment on the recent issuance of Interagency Questions and Answers Regarding Community Reinvestment. As the banking industry continues to evolve and utilize technology to serve its customers in new ways, this revision of the Q&As is very much needed.

*Regarding how examiners will evaluate alternative delivery systems for delivering retail banking services. See 12 CFR \_\_.24(d). Examiners will consider any information an institution maintains and provides to examiners demonstrating that the institution's alternative delivery systems are available to, and used by, low- or moderate-income individuals, such as data on customer usage or transactions, the ease of access, whether physical or virtual; the cost to consumers, as compared with other delivery systems; the range of services delivered; the ease of use; the rate of adoption; and the reliability of the system.*

While we do believe that consumer use of smart phones and mobile banking has expanded the reach of financial institutions when providing retail banking services to low and moderate-income individuals, it would be difficult to document that usage since income information is not captured at account opening. Even if income information was captured, over time it would likely become stale. Regarding geographic distribution, we could make the assumption that if a service is used in a low or moderate-income census tract that the user is low or moderate-income, but can this assumption be verified? It is not clear what is meant by reliability of the system. How would reliability be determined by the examiner?

*The Agencies believe that the proposed revisions to existing guidance would encourage broader availability of alternative delivery systems to low- and moderate-income geographies and individuals without diminishing the value full-service branches provide to communities. The text of proposed revised Q&A § \_\_.24(d) The Agencies propose deleting language that states "performance standards place primary emphasis on full service branches" and further deleting the statement that provides that alternative systems are considered "only to the extent" that they are effective alternatives in providing needed services to low- and moderate-income geographies and individuals.*

We support deleting the performance standards that places primary emphasis on full service branches. While brick and mortar branches do play an important role in offering services to customers, branches are not the only way that customers access services. Advances in internet banking and mobile banking have

provided for more access to customers regardless of where bank branches are located. Services such as remote check deposit, internet banking, and loan by phone augment the need for brick and mortar branches. As examiners recognize that alternative delivery services are just as likely to be used by low and moderate-income individuals as other income groups, this should lessen the emphasis on operating brick and mortar branches, especially if they are not profitable.

Thank you for the opportunity to submit comments.

Best Regards,

Sunada Pool Brookins  
Vice President  
Director of CRA/Community Affairs  
Whitney Bank