

**From:** Kristen Harper [<mailto:KHarper@rbt.com>]  
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**To:** Comments  
**Subject:** RIN 3064-ZA02

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Good Morning,

This comment is in regard to the above-referenced Request for Information regarding FDIC Communication and Transparency.

[https://www.fdic.gov/news/news/press/2018/pr18067a.pdf?source=govdelivery&utm\\_medium=email&utm\\_source=govdelivery](https://www.fdic.gov/news/news/press/2018/pr18067a.pdf?source=govdelivery&utm_medium=email&utm_source=govdelivery)

### *Efficiency*

**Personal Comment.** FILs shared by the FDIC have proved helpful in past situations that required clarity to ensure compliance with lending regulations. It would be beneficial to be able to submit questions to the FDIC and if a direct response is not feasible, at least a quarterly summary of questions from lenders *with FDIC answers* would be greatly beneficial to Bankers. The CFPB has a site where Bankers can submit questions, referencing the particular regulation, etc. Sometimes a response is given via email but most of the time it is via phone call. Of course it would be most beneficial to have an emailed or otherwise 'written' response, and also would be beneficial if these could be published for all Bankers to access (again, the Quarterly Q&A may be the best route for this).

**Response to Q2.** It is not clear to me which communication is supervisory and which is purely informational.

### *Ease of Access*

**Personal Comment and Response to Q2.** I have found the regulations as posted to the FDIC website to be difficult to read and have switched to referring to the regulations as posted by the CFPB's website instead. Enhancements that would be particularly helpful for researching regulations would be a main regulations page with a listing of regulations to select from (similar to the CFPB). Then within each regulation, it would be helpful if indentation were used with the bullets instead of the entire regulation flowing with a single margin format. Also, similar to the CFPB's site, it would be helpful if there were dropdowns below each applicable section/subsection(s) of the regulations to directly show the "Official Interpretations" to that section instead of having to read the regulation and then go to a different window to *search* and then read the OI attached to that section/subsection.

### *Content*

**Response to Q2.** It would be beneficial to my particular job duties in Compliance/research if the FILs were organized by applicable regulation and/or topic, and then chronologically. I think they should also

be updated if the information is no longer valid with a link to the newer/updated/corrected FIL or other corrected publication document.

Thank you for the opportunity to provide feedback.

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