



Advancing Economic Security  
and Community Prosperity

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December 20, 2019

Comptroller Joseph Otting  
Office of the Comptroller of the Currency  
400 7th Street, SW  
Washington, DC 20219

Chair Jelena McWilliams  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

RE: **Community Reinvestment Act Regulations, Docket ID OCC-2018-0008**

Dear Comptroller Otting and Chair McWilliams:

Woodstock Institute strongly urges you to extend the comment period on the Notice of Proposed Rulemaking (NPR) titled *Community Reinvestment Act Regulations* from 60 days to 120 days to allow interested and impacted parties to develop and submit informed comments on this far-reaching proposal. The upcoming holidays effectively mean that two weeks will be subtracted from the current 60-day comment period. Further, the NPR is long and intricate and requests comments on multiple questions. As currently proposed, the regulations change will have a significant impact on banks and the communities they serve across the country. The interests of informed rulemaking and open and transparent government are best served by having a 120 day comment period.

## About Woodstock Institute

Woodstock Institute is a leading nonprofit research and policy organization in the areas of equitable lending and investments; wealth creation and preservation; and safe and affordable financial products, services, and systems. Woodstock Institute works locally and nationally to create a financial system in which economically and racially segregated communities can safely borrow, save, and build wealth so that they can achieve economic security and community prosperity.

Very truly yours,

A solid black rectangular box redacts the handwritten signature of Jean Pogge.

**Jean Pogge**  
Interim Director