

August 14, 2020

via email to [regs.comments@occ.treas.gov](mailto:regs.comments@occ.treas.gov), [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov),  
[comments@fdic.gov](mailto:comments@fdic.gov)

Office of the Comptroller of the Currency  
Chief Counsel's Office  
Attention: Comment Processing  
400 7th Street, SW.  
Suite 3E-218  
Washington, DC 20219

Ann E. Misback  
Secretary, Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551

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

RE: Loans in Areas Having Special Flood Hazards; Interagency Questions and Answers Regarding Flood Insurance (Docket ID OCC-2020-0008; Docket No. OP-1720; RIN 3064-ZA16)

To Whom It May Concern:

The American Bankers Association (ABA)<sup>1</sup> deeply appreciates the collective action of the Office of the Comptroller of the Currency (OCC), the Board of Governors of the Federal Reserve System (Board), the Federal Deposit Insurance Corporation (FDIC), the Farm Credit Administration (FCA), and the National Credit Union Administration (NCUA) (“the Agencies”) to release the proposed Interagency Questions and Answers Regarding Flood Insurance (“proposed Q&As”).<sup>2</sup> The proposed Q&As are an important step in providing more guidance to banks and other lenders on interpretative issues that have arisen since the passage of the 2012 Biggert-Waters Act, the 2014 Homeowners Flood Insurance Affordability Act, and the 2019 Joint Final Rule on private flood insurance.

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<sup>1</sup> The American Bankers Association represents banks of all sizes and charters and is the voice for the nation's \$13 trillion banking industry and its 2 million employees. ABA's extensive resources enhance the success of the nation's banks and strengthen America's economy and communities. Learn more at [www.aba.com](http://www.aba.com).

<sup>2</sup> <https://www.fdic.gov/news/press-releases/2020/pr20077a.pdf>

Given the Agencies' considerable effort to reorganize and revise the existing Questions and Answers, as well as introduce a number of new Question and Answers, ABA is requesting additional time to provide feedback on the proposal. The changes in the proposed Q&As are significant and require a comprehensive review to properly consider their impact. An additional 60 days after the current September 4, 2020 comment deadline would allow ABA to provide complete and carefully considered feedback on the proposed Questions and Answers.

We appreciate your consideration of this request.

Sincerely,



Diana C. Banks  
Vice President and Senior Counsel, Fair & Responsible Banking  
Regulatory Compliance and Policy