

Waukesha State Bank

(262) 549-8500 | www.waukeshabank.com | 151 E. St. Paul Ave. | P.O. Box 648 | Waukesha, WI 53187-0648 | Member FDIC

August 5, 2022

James P. Sheesley
Assistant Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
Attention: Comments RIN 3064–AF81

Chief Counsel’s Office
Office of the Comptroller of the Currency
400 7th Street SW
Suite 3E–218
Washington, DC 20219
Attention: Comment Processing, Docket ID OCC—2022-0002

Ann E. Misback
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
Attention: Comments Docket R-1769; RIN 7100-AG29

Re: Community Reinvestment Act Regulations

Dear Madam or Sir:

Waukesha State Bank appreciates this opportunity to provide feedback to the Federal Deposit Insurance Corporation’s (“FDIC”), the Office of the Comptroller of the Currency’s (“OCC”) and the Board of Governors of the Federal Reserve System (“FRB”) request for comments in response to its Notice of Proposed Rulemaking (“NPR”) on reforming the Community Reinvestment Act (“CRA”) regulatory framework.

Waukesha State Bank is a \$1.4 billion community bank in Waukesha County, Wisconsin with FDIC as our primary regulator. Our main lending focus is mortgage and commercial lending in addition to a Trust Department with approximately \$1 billion under Asset Administration.

We support the need for CRA modernization. CRA regulation and supervision have become overly complex, unpredictable, and they have not kept up with the way the consumers expect to use technology to access financial products and services. The need to update CRA has existed for years and will grow more pressing as technology and the financial services industry continue to evolve.

One area we would appreciate additional guidance on is regarding the definition of a branch. As proposed, the definition of a branch “means a staffed banking facility, whether shared or unshared, that is approved or authorized as a branch by the FDIC and that is open to, and accepts deposits from, the general public.”

FDIC requires a branch application to open a trust office. The reason for that is they define trust accounts as deposits even if they don't actually receive deposits at the office. If a branch does not make loans or accept deposits except as defined above, we think a trust office should be ignored as a branch for CRA purposes.

Thank you for your time and consideration.

Sincerely,

Cheryl Beede
Vice-President
CRA Officer