

Mr. Martin J. Gruenberg
Acting Chairman
Federal Deposit Insurance Corp.
550 17th Street NW
Washington, DC 204229

August 1, 2022

RE: Federal Deposit Insurance Corporation: 12 CFR Part 345, RIN 3064-AF81
Federal Reserve System: Docket No. R-1769, RIN 7100-AG29
Office of the Comptroller of the Currency: Docket ID OCC-2022-0002, RIN 1557-AF15

Dear Acting Chairman Gruenberg:

I have many years of experience working in declining communities in supporting efforts to expand homeownership to LMI borrowers. A number of my clients have brought to my attention a possible inclusion of Special Purpose Credit Program (SPCP) in the forthcoming CRA regulations. I want to express my strong support of this concept and program. I also took note that the Consumer Protection Finance Bureau is also very positively endorsing this approach. These credit enhancement programs provide an opportunity for lenders to be more creative in structuring homeownership programs and partnering with community-based organization.

Thank you for your careful consideration of my suggestion.

Sincerely,

Michael P. Butler
President
Grant Forbes, LLC