

From: Aaron Walker <awalker@sbko.bank>
Sent: Thursday, September 08, 2022 7:00 PM
To: Comments
Subject: [EXTERNAL MESSAGE] August 2, 2022 - Policy Statement on Prudent Commercial Real Estate Loan Accommodations and Workouts; Comment Request (RIN 3064-ZA33)

Thank you for putting together this publication with excellent real life scenarios. I found the cases studies very helpful.

I did want to comment on Case I-Multi Family Property-Scenario 2 (page 82 of 89). This Scenario sounded eerily like the COVID period in 2020 and I would think that if we are faced with such an event where the federal and state governments were barring evictions that the FDIC would offer up special guidance (such as during the CARES Act during the first part of the COVID period in 2020) and likely wouldn't be mandating most loans going on non-accrual. My advice would be to eliminate this Scenario 2, as I'm not sure this is really something that would be encountered without additional special FDIC guidance being set forth due to the disastrous type of impact such an event would cause.

If you choose to keep the scenario in place, I would suggest a slight change in semantics to the following sentence:

"In response to an event that caused severe economic conditions, the federal and state governments enacted moratoriums on all **rent payments**."

Taken at face value, that means that government has ordered all rent payments to stop. I think what you intended to say here is that there would be a moratorium on evictions. Therefore, I would replace the highlighted section above that says "rent payments" with the word "evictions."

Thank you for your consideration of my comments, and again, I commend you for putting forth very valuable guidance.

Aaron Walker
Chief Credit Officer



96 E. Broadway, Eugene, OR 97401

Direct: 541.684.7526
Cell: 541.914.8790
Main Line: 541.357.5600
Website: www.sbko.bank

Follow us on: 



