March 30, 2020

RE: Notice of Proposed Rulemaking  
Community Reinvestment Act Regulations  
Docket ID OCC-2018-0008  
RIN 3064-AF22

To Whom It May Concern:

We, the undersigned small business owners, are writing to comment on the Notice of Proposed Rulemaking (NPR) Docket ID OCC 2018-0008/RIN 3064-AF22, regarding changes to the Community Reinvestment Act.

The Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation’s proposed changes to the law would hurt small businesses. Small businesses owners, like us, rely on responsible and affordable capital to get our businesses off the ground, keep the lights on and to grow. Reducing access to capital hurts small businesses, our employees and the American economy.

We believe that small businesses should be prioritized, not redefined. The NPR proposes increasing the definition of small business lending from $1 million to $2 million for both the size of the business and the size of the loan. Most small business owners need small amounts of financing. The Federal Reserve’s 2019 Small Business Credit Survey found that 92% of business owners looking for financing sought less than $1 million, with 57% seeking less than $100,000.

The small business lending definition should remain at $1 million to encourage banks to meet the financing needs of the majority of small businesses. Doubling the definition lets banks receive CRA credit for making larger loans instead of focusing on the actual needs of small business owners.

A recent Consumer Financial Protection Bureau report revealed that, in 2017, small business lending from banks had not returned to pre-Great Recession levels and, in fact, had only recovered to just half of the lending levels of 2004. The National Community Reinvestment Coalition estimated that the proposed reforms could result in the loss of up to $16 billion in small business lending to low- and moderate-income communities over five years.

There is a lack of affordable, small dollar capital in the marketplace, and these changes would give banks even less incentive to make or invest in the smaller loans that a majority of small business owners really need. Fewer small business owners, like us, would receive affordable loans -- loans that have a lasting, positive effect on businesses and communities.

We strongly urge the OCC and FDIC to reconsider this proposal.

Sincerely,

193 small business owners across the United States.

● Jeffrey, Alaska Datatronics, Inc., Anchorage, AK
● John, CCT Logistics Inc., Theodore, AL
● Caleb, The Phoenix Counseling Collective LLC, Phoenix, AZ
- Alex, Conaxion, Pasadena, CA
- Alicia, Stare Fashion LLC, Los Angeles, CA
- Anselmo, Lucy's Fruits, Santa Clara, CA
- Antonio, Cassave Restaurant & Taqueria, Emeryville, CA
- Arturo, A&PE Trucking, Fontana, CA
- Ben, South Coast Press, Santa Ana, CA
- Bendiga, Acsa Janitorial Services, Daly City, CA
- Bernita, Bernita Mason, Anaheim, CA
- Bill, Legacy Print, Inc., Santa Clara, CA
- Brianne, Black Diamond Tattoo, Venice, CA
- Carla, Mays Civic Innovation, San Francisco, CA
- Craig, Johnny Doughnuts, San Rafael, CA
- David, 5th Avenue Energy, San Diego, CA
- David, Jackie’s Jams, San Diego, CA
- Dawson, Dawson Industrial Supply Company, Wilmington, CA
- Deamer, Pajaro Street Inc., Salinas, CA
- Diana, Makeup by Diana, San Jose, CA
- Diane, Freedom Financial Solutions, Inc., Riverside, CA
- Donna, Donna Murray Design Concepts, Monrovia, CA
- Eddie, Gerontology Home Companion Agency, Inc., Santa Monica, CA
- Elizabeth, A Grape in the Fog, Pacifica, CA
- Elizabeth, Pasiones Latinas Radio Online & Revista, Riverside, CA
- Erich, Picturewall, San Rafael, CA
- Erin, Dachs 2 Danes, Inc., Anaheim, CA
- Ezequias, Tacos Acapulco, Oakland, CA
- Faye, Writing: 1985 Plus!, Vista, CA
- Francisco, Lemus Transport, Moreno Valley, CA
- Holly & William, Cline Construction, Inc., Spreckels, CA
- Jacqueline, Jacobs Professional Services, Oakland, CA
- Jaime, Joyeria Trejo, Sacramento, CA
- James, Organic Mechanics, San Francisco, CA
- Janiece, Magic Hair Company, Culver City, CA
- Jazmyn, SheRevolts, Long Beach, CA
- Jennifer, Painting In Action, Pittsburg, CA
- Johannes, First Choice Bio LLC, Benicia, CA
- John, Mahogany Woodworks, Cerritos, CA
- Jose, Solis Trucking, Ontario, CA
- Juana, NiceOneFlowers, San Francisco, CA
- Kathleen, San Marcos Yoga, San Marcos, CA
- Keith, The Center for Corrective Exercise, San Diego, CA
- Kelly, Access Trax, San Diego, CA
- Lauren, Andytown Coffee Roasters, San Francisco, CA
- Leah, Gondola Servizio, Berkeley, CA
● Leila, Northridge Family Daycare, Daly City, CA
● Linda, Carelink Services, Inc, Los Angeles, CA
● Lorraine, American Real Estate List & Sell, Riverside, CA
● Luis, MM Roll-Off Service Corp, Rancho Cucamonga, CA
● Manuel, Chile Jalapeno Taqueria, Emeryville, CA
● Marc, The King's Eye, Westminster, CA
● Mari, Flooring Alternatives, Berkeley, CA
● Maria, 3H Cycling LLC, Artesia, CA
● Mark, Lavallís Better Body Exercise Equipment, Hayward, CA
● Marlyn, GEM Coffee, San Diego, CA
● Martha, Puerto Nuevo, Inglewood, CA
● Mia, Level Up Insurance Solutions, Oakland, CA
● Michael, Main Street, Rohnert Park, CA
● Michael, Information Technology Consulting, Corona, CA
● Michael, Dew Logistics, Moreno Valley, CA
● Miguel, Dulceria Chispita, San Jose, CA
● Nelson, Danel Roofing Inc., San Martin, CA
● Nelson, Enrique Signs, Los Angeles, CA
● Nona, Nona Lim, Emeryville, CA
● Norman, Tetrad Capital, Los Angeles, CA
● Orion, Fresh Brand Foods, Milpitas, CA
● Oscar, Veritos Transportation, Bloomington, CA
● Pancho, The Hatch, Oakland, CA
● Patricia, SF Parking, LLC, San Francisco, CA
● Paul, Iguanas Burritozilla, San Jose, CA
● Paul, Estate Greens, Inc, Palm Desert, CA
● Ricardo, Halcón Distribución, San Leandro, CA
● Robin, CA Design, Rohnert Park, CA
● Romeo, Gedeon Cleaning Service, Van Nuys, CA
● Rosa, Rosa's Flea Market, San Jose, CA
● Rui, New Era Piping and Fittings Group Inc, South El Monte, CA
● Sergio, American Deluxe Mattresses, Paramount, CA
● Seval, Haley's Express Trucking Inc, Moreno Valley, CA
● Shay, Ice Diamond Inc, San Francisco, CA
● Sidney, Rise Transportation, Merced, CA
● Stacey, SunSpark Yoga, Orange, CA
● Taniya, Bluetree Café, Anaheim, CA
● Tanya, In Him Construction, Inc, Covina, CA
● Teresa, Belle Cose, San Francisco, CA
● Tina, A Girl Named Pinky, Berkeley, CA
● Tom, Studio City Sound, North Hollywood, CA
● Trenell, Trenell Leshelle Hair & Makeup Studio, Oakland, CA
● Victor, La Guatemalteca, Oakland, CA
- Victor, Agape Logistics Inc, Long Beach, CA
- Yolanda, Cozumez Media, Sherman Oaks, CA
- Angie, LaserAce, LLC, Durango, CO
- Belinda, Floobis Enterprises, Wellington, CO
- Cara, Jazzie Beans LLC, Littleton, CO
- James, Flatirons Pharmaceuticals, LLC, Longmont, CO
- Jeffrey, The Logos Group, Nederland, CO
- Larae, 52Eighty Entertainment, Denver, CO
- Margo, Ala Carte Learning Solutions, Inc. A Public Benefit Corp., Greeley, CO
- Ron, Ron Jiron Distribution Company, Peyton, CO
- Tera, Tera's Gardens, Basalt, CO
- Richard, Elirion, Inc., Southbury, CT
- Wole, Swahili Aviation Aerospace, LLC, Tolland, CT
- Aditya, ADI/A&A, Washington, DC
- Christopher, Fly kings, Washington, DC
- Karin, Here's The Scoop, Washington, DC
- Beatriz, Boteka, Miami, FL
- Bob, The Victoria Law Group, Miami, FL
- Catina, Seymourwynn Investments LLC, Ocala, FL
- Deborah, TreeFrog Data Solutions, Cocoa Beach, FL
- Jessica, Jewels N Gems Shop, Orlando, FL
- Jessica, JJAB Advantage, Winter Garden, FL
- Melanie, We3Co, LLC, North Port, FL
- Nadja & Toby, Waul 2 Waul Transport, North Lauderdale, FL
- Ralph, RV International LLC, Hollywood, FL
- Beverly, Nana's By The River B&B, LLC, Decatur, GA
- Bruce, Paramount Graphics, Cumming, GA
- Joann, Four Seasons, Atlanta, GA
- Latonya, LC Tax & Bookkeeping Service, Snellville, GA
- Lester, Trailblazer Benefits, LLC, Atlanta, GA
- Ronald, W. Garnett & Associates, Augusta, GA
- Teresa, TRJ Transportation Inc, Douglasville, GA
- Angel, Frida Room, Chicago, IL
- Darlynn, Lyn Cole, Chicago, IL
- Gil, Guile's Eyewear Boutique Inc., Chicago, IL
- Hugh, Triple D Trucking LLC, Chicago, IL
- Laurie, Harpy Information Technology Solutions, St. Louis, IL
- Lynetta, All Weather Specialist Inc, Chicago, IL
- Maricela, Sunset Automotive, Inc, Waukegan, IL
- Zaneta, Zoe Naturals Co., Chicago, IL
- Cynthia, Watson Agency, Inc., Cicero, IN
- Ivan, Sanchez Enterprise LLC, Olathe, KS
- Aleshia, EagleLove Accounting Consultancy Firm, LLC, Louisville, KY
Jacqueline, BeneSolve, LLC, Louisville, KY
Earline, Earline D Marchand DBA: Non-Attorney Representative, Lake Charles, LA
Drita, MAPA Translations, Framingham, MA
Maruta, Elite Protective Services LLC, Chelsea, MA
Benies, OPR, Laurel, MD
Connie, East Coast Property Solutions, Inc., Woodbine, MD
Murry, Contract Design & Development, LLC, Laurel, MD
Sirina, Apombee, Laurel, MD
Bennie, Marketing for Green, LLC, Detroit, MI
Misty & Timothy, Arbre Croche Cultural Resources, Leslie, MI
Chrissy, Seville Woodworks, Columbia, MO
Diana, Ace Manufacturing and Parts, Sullivan, MO
Jeanne, KC Wineworks LLC, Kansas City, MO
Taria, Assured Health Services, LLC, Saint Louis, MO
Gaye, Insurance & Funeral Service, Corinth, MS
Brandon, Tropical Smoothie Cafe, Wilmington, NC
Diane, Car-One Auto Body Inc, Salem, NH
Sean, Weichert, Jersey City, NJ
Carol, Circia LLC DBA C. Lacey Artworks, Albuquerque, NM
Clayton, Pickle Fork Industries LLC, Albuquerque, NM
Erika, Erika Jones & Associates, Santa Fe, NM
Pam, Mannindle Cafe, Ithaca, NY
Sam, AMDi, Farmingdale, NY
Wendy, The Relationship Centers, Inc, Buffalo, NY
Andrew, Fuqua's Lawn Cutting & Snow Removal, Toledo, OH
Bonita, First Source, Toledo, OH
DT, Dewberry Associates, Dayton, OH
J.A., Forgotten Lore Publishing, llc, Cleveland, OH
Jeff, Fanger & Associates LLC, Cleveland, OH
Letha, Bake Me Happy, Columbus, OH
Lois, Hope Whispers Community Organization/Jones Rehab Inc, Canton, OH
Nina, Ivy League Cleaning, Xenia, OH
Renato, Griswold Home Care, Brunswick, OH
Steven, Ohio Knitting Mills, Cleveland, OH
Anita, AA pipeline and Services, Burns Flat, OK
Nathaniel, Leather Services and More Direct, Oklahoma City, OK
Claire, Refinish First LLP, Tigard, OR
Herode, Herode Beauvais LLC, Allentown, PA
Jerry, Greater Columbia Medical Transport LP, Scranton, PA
John, John ODonnell & Sons Inc, Glenside, PA
Sharon, Chief Cornerstone, Columbia, SC
James M., JM Johnson Trucking, Inc., Pearland, TX
Jimmie, Tax Consultants Plus Inc, Missouri City, TX
- Kushal Pal Singh, Credence Medicure Corporation, Garland, TX
- Maria, Results Video, Inc., El Paso, TX
- Victoria, Biz Wiz Consulting, Washington, UT
- Betty, Team Placement Service, Inc, Alexandria, VA
- Clarence, Capitol Credit Group, LLC, Montclair, VA
- Cori, BEAST Barbell Club LLC, Newport News, VA
- Falah, Technical Resolution Corp, Lorton, VA
- Jessie, Glass Ceiling HR LLC, Richmond, VA
- Lavern, LaVern Dillard, Fishersville, VA
- Lesha, Heaven's Touch Nursing Svc, LLC, Richmond, VA
- Sandra, Sustainable Design Consulting, LLC, Richmond, VA
- Shirley, 3D Design and Manufacturing LLC, Powhatan, VA
- Suzanne, Vision Solutions, Keswick, VA
- Wendy, Wendy Mackenzie, Peacham, VT
- Jessica, Escape Tactics LLC, Wenatchee, WA
- Shawn, Woolley Cheese Co., Sedro Woolley, WA
- Harshad, Eagle, Mequon, WI
- Janet, Creative CNC, LLC, Hartland, WI