

From: Paul J Jarosz
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Name: Paul J Jarosz

Affiliation:

Category of Affiliation:

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

CRA Rules and Regulations require financial institutions to maintain a public file that includes a map of each assessment area showing the boundaries of the area and identifying the geographies contained within the area, either on the map or in a separate list. It is not unusual for a financial institution to have an assessment area that encompasses a Metropolitan Division and/or Metropolitan Statistical Area.

Such assessment areas encompass hundreds, if not thousands, of geographies (census tracts). Complying with the requirement to include either a map or list of all geographies in the public file seems onerous and unnecessary on several levels. There is considerable time and effort expended to collect this information. Paper is unnecessarily used to create such maps and/or lists. With the advent of the Internet, such information is readily available to the general public. I should add that in my 20+ years in compliance, I have never received a request for this information.

Further, from an informal survey I conducted of other CRA officers, only 5% have ever received a request in their careers specifically for census tract information. With this in mind, I would respectfully suggest that either this particular requirement be stricken from the public file requirements or they be revised to permit that such information is to be provided within a certain number of days from the date the request is received from the public?