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July 30, 2009

Office of the Comptroller of the Currency  
250 E. Street, S.W.  
Mail Stop 2-3  
Washington, DC 20219  
Docket No. OCC-2009-0010

Jennifer J. Johnson  
Secretary  
Board of Governors of the Federal  
Reserve System  
20<sup>th</sup> Street and Constitution Avenue, N.W.  
Washington, DC 20551  
Docket No. R-1360

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, N.W.  
Washington, DC 20429  
RIN 3064-AD45

Regulations Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, N.W.  
Washington, DC 20552  
Attention: OTS-2009-0010

RE: Community Reinvestment Act Regulations; Joint Notice of Proposed Rulemaking

Dear Sir or Madam:

Citibank, N.A. appreciates the opportunity to comment on this joint notice of proposed rulemaking ("Proposal") under the Community Reinvestment Act (CRA). Citibank, through its subsidiary, Student Loan Corporation, is a leading provider of FFEL and private student loans.

Citibank supports the positions taken by The Consumer Bankers Association (CBA) in its letter to the Agencies on the Proposal. We fully support the goals of encouraging financial institutions to provide affordable educational loans to low income borrowers, and we believe that the suggestions made by the CBA in its letter will serve to make the revisions to the Community Reinvestment Act ("CRA") enacted by the Higher Education Opportunity Act workable for the financial institutions that are subject to the CRA in a way that will incent them to make such loans.

We thank you again for this opportunity to comment on the Proposal. If you have any questions or would like to discuss this further with Citibank, please do not hesitate to contact Edward Handelman at (212) 559-2363, or the undersigned at (212) 559-2938.

Very truly yours,

A handwritten signature in black ink, appearing to read "Carl V. Howard". The signature is fluid and cursive, with the first name "Carl" being the most prominent.

Carl V. Howard  
Deputy General Counsel