

Proposal: 1769(AG29) Regulation BB: Community Reinvestment Act

Description:

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From: Brookline Bancorp, Timothy Dugan

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Subject: Reg BB; Community Reinvestment Act

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Comments:

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First name: Timothy

Middle initial: E

Last name: Dugan

Affiliation (if any): Brookline Bancorp

Affiliation Type: Commercial (Com)

Address line 1: 131 Clarendon Street

Address line 2: PO Box 179179

City: Boston

State: Massachusetts

Zip: 02117

Country: UNITED STATES

Postal (if outside the U.S.):

Your comment: We strongly urge deferring implementation of the CRA NPR (January 2023) for an additional 12 months so that the multitude of changes suggested in the proposed rule can be addressed satisfactorily with the various impacted business lines. As you are aware, the NPR is quite lengthy and bank advocacy groups or the ABA (American Bankers Association) would need to opine on issues presented by the changes. A longer implementation time would allow for preparation and system changes and processes to be designed and tested.