

March 8, 2017

The Honorable Keith Rothfus  
1205 Longworth House Office Building  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Jim Himes  
1227 Longworth House Office Building  
United States House of Representatives  
Washington, D.C. 20515

Dear Representatives Rothfus and Himes:

On behalf of the members of the American Bankers Association, I am writing to express our strong support for your legislation to provide greater flexibility to institutions chartered under the Home Owners Loan Act (HOLA).

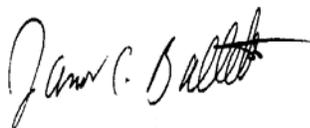
Your legislation would provide greater flexibility to institutions chartered under the HOLA. The legislation is the epitome of sensible regulatory relief. It will allow mutual and stock savings associations chartered under the Home Owners Loan Act to better serve the small business and commercial lending needs of their communities, without having to go through lengthy and costly charter conversions.

We note that the proposal is modeled on an approach championed by Comptroller of the Currency Tom Curry in his home state of Massachusetts when he was the commissioner of banking there. The legislation will allow a federal savings association to elect to function as, and be regulated like, a national bank without having to change charters or governance structure. The OCC regulates both national banks chartered under the National Bank Act and federal thrifts chartered under the Home Owners Loan Act, and thus has expertise in regulating both types of institutions.

ABA has long championed greater flexibility for HOLA chartered institutions to adapt their business models to changing demographics and changing needs in their communities. Federal saving associations have a long, proud history of being responsive to their communities' needs, and this legislation will help them to enhance and continue that record.

We look forward to working with you toward passage of this needed and important legislation.

Sincerely,



James C. Ballentine