

August 8, 2014

*Submitted via Email*Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
400 7th Street, S.W.
Washington, DC 20219Re: *Integration of Licensing Rules for National Banks and Federal Savings Associations*
Docket ID: OCC-2014-0007 RIN: 1557-AD80 (June 10, 2014)

To Whom it May Concern:

The American Bankers Association¹ appreciates the opportunity to comment on the OCC's proposal to amend and integrate the licensing rules for national banks and Federal savings associations.

ABA believes that integrated rules can create efficiencies for both national banks and Federal savings associations and welcomes some changes contemplated in this proposal. However, we are concerned that the OCC proposal may impose new, unfamiliar and unnecessary burdens on institutions that may complicate the task of regulatory compliance without commensurate improvement in bank supervision. Further troubling changes are those that would move beyond conforming and technical amendments to create new, stricter requirements for national banks, Federal savings associations, or both.

As stated in this proposal's background section, the OCC will consider licensing comments received through this rulemaking and the first request for comments from the current EGRPRA² review. We appreciate the OCC's flexibility and will provide further comments on this proposal before EGRPRA's first request for comments closes on September 2, 2104.

Sincerely,



Shaun Kern

¹ The American Bankers Association is the voice of the nation's \$14 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2 million people, safeguard \$11 trillion in deposits and extend nearly \$8 trillion in loans.

² The Economic Growth and Regulatory Paperwork Reduction Act of 1996 (EGRPRA) requires the FFIEC, OCC, FDIC, and Federal Reserve System to conduct a review of regulations to identify those that are outdated, unnecessary, or unduly burdensome no less frequently than every 10 years.