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**FDIC**

**Community Reinvestment Act Regulations**

**OCC Docket ID OCC-2018-0008**

Please add this to the comments being solicited on this matter.

As long as you are considering revision to the CRA Regulation you ought to include credit unions in your purview:

- CUs are primarily consumer lenders and so may potentially redline and steer as easily as commercial banks might
- CUs have a very large share of the consumer auto market
- CUs are a formidable consumer lender in general, siting brick & mortar facilities where most convenient for their members, and avoid locating in low and moderate income communities
- The average economic profile of CU members is higher than that of most commercial banks – why should the latter be scrutinized for its community commitment yet the former is not?
- does CU Field of Membership in effect have a disparate impact on who qualifies for membership?
- CUs advertise heavily; how do they translate that into practice (do they advertise selectively? Do they lend with disparate impact?)
- What is the justification for CUs' having escaped this regulation to date?

Thank you for your consideration.

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