May 9, 2018

The Honorable Paul D. Ryan Speaker U.S. House of Representatives Washington, D.C. 20515

The Honorable Kevin McCarthy Majority Leader U.S. House of Representatives Washington, D.C. 20515

The Honorable Steve J. Scalise Majority Whip U.S. House of Representatives Washington, D.C. 20515

The Honorable Nancy Pelosi Democratic Leader U.S. House of Representatives Washington, D.C. 20515

The Honorable Steny H. Hoyer Democratic Whip U.S. House of Representatives Washington, D.C. 20515

Dear Speaker Ryan, Majority Leader McCarthy, Majority Whip Scalise, Democratic Leader Pelosi, and Democratic Whip Hoyer:

The undersigned state banking associations representing our nation's nearly 5,700 community banks respectfully urge you to take up and pass S. 2155, the Economic Growth, Regulatory Relief and Consumer Protection Act, as quickly as possible. S. 2155 is a rare bipartisan opening for real, impactful community bank regulatory relief that will strengthen economic growth, job creation, safety and soundness, and consumer protection.

S. 2155 bears the unmistakable stamp of numerous community bank regulatory relief bills that have advanced in the House in the 115th Congress and in prior Congresses. Years of hearings, debate, and deliberation in the House prompted the Senate to craft, debate, and ultimately pass S. 2155. Key provisions of S. 2155 replicate House bills, many of which have bipartisan support.

House passed provisions in S. 2155 include:

- Automatic "qualified mortgage" (QM) status for community bank mortgages held in portfolio. (H.R. 2226. Passed House Financial Services Committee 55-0 and passed House on voice vote.)
- Escrow relief for community bank mortgages held in portfolio. (H.R. 3971. Passed House on broad bipartisan vote.)
- Relief from <u>new</u> Home Mortgage Disclosure Act (HMDA) data collection and reporting for lenders that originate fewer than 500 mortgages annually. (H.R. 2954. Passed House on bipartisan vote.)
- Relief from Basel III capital rules for community banks with a high leverage ratio. Basel III is intended for large, internationally active banks. (Similar to "off ramp" provision of the Choice Act, H.R. 10.)

- Create "short form" call report for use in first and third quarters of each year by well-rated banks with assets of less than \$5 billion. (H.R. 4725. Passed House Financial Services Committee 55-0 and passed House on a voice vote.)
- Volcker Rule exemption for banks with assets of less than \$10 billion. (H.R. 4790. Passed House 300-104.)
- Easing restrictions on reciprocal deposits to keep deposits in the community. (H.R. 2403. Bipartisan sponsorship.)
- Appraisal requirement exemption in areas with a scarcity of licensed appraisers. (H.R. 3221. Passed House Financial Services Committee 32-26.)

We will continue to aggressively advocate for needed community bank regulatory relief measures that are not included in S. 2155. However, S. 2155 has passed a critical test in the Senate. This bill represents the best and most realistic opportunity to enact meaningful regulatory relief for community banks in the 115th Congress. The time for endless debate and deliberation is over. We urge you to seize this unique opportunity to immediately pass community bank regulatory relief that can be signed into law by the President.

Thank you for your consideration.

Sincerely,

Alabama Bankers Association, Inc.

Arkansas Community Bankers

Arizona Bankers Association

Community Bankers of Washington

California Community Banking Network

Independent Bankers of Colorado

Florida Bankers Association

Community Bankers Association of Georgia

Community Bankers of Iowa

Idaho Bankers Association

Community Bankers Association of Illinois

Indiana Bankers Association

Community Bankers Association of Kansas

Bluegrass Community Bankers Association

Louisiana Bankers Association

Massachusetts Bankers Association, Inc.

Maryland Bankers Association

Maine Bankers Association

Community Bankers of Michigan

Independent Community Bankers of Minnesota

Missouri Independent Bankers Association

Mississippi Bankers Association

Montana Independent Bankers

North Carolina Bankers Association

Independent Community Banks of North Dakota

Nebraska Independent Community Bankers

New Hampshire Bankers Association

New Jersey Bankers Association

Independent Community Bankers Association of New Mexico

Independent Bankers Association of New York State

Community Bankers Association of Ohio

Community Bankers Association of Oklahoma

Oregon Bankers Association

Pennsylvania Association of Community Bankers

Independent Banks of South Carolina

Independent Community Bankers of South Dakota

Tennessee Bankers Association

Independent Bankers Association of Texas

Virginia Association of Community Banks

Vermont Bankers Association, Inc.

Wisconsin Bankers Association

Community Bankers of West Virginia

Wyoming Bankers Association

CC: Members of the U.S. House of Representatives