



May 27, 2016

Delivered via e-mail to: innovation@occ.treas.gov

Office of the Comptroller of the Currency
400 7th Street, S.W., Suite 3E-218
Mail Stop 9W-11
Washington, D.C. 20219

Ladies and Gentlemen:

On March 31, 2016, the Office of the Comptroller of the Currency (the "OCC") issued a report entitled "Supporting Responsible Innovation in the Federal Banking System: An OCC Perspective" (the "Report") which describes the OCC's vision for responsible innovation in the federal banking system, discusses the principles that will guide the development of the OCC's framework for evaluating new and innovative financial products and services, and requests comments and feedback.

The Structured Finance Industry Group ("SFIG")¹ appreciates the opportunity to provide comment on the Report. We support the statements in the Report that make clear the OCC's desire to encourage innovation and to encourage banks to include innovation in their strategic planning.

As a first step in the process for determining a regulatory approach for financial innovation, SFIG recommends that the OCC undertake a full and comprehensive review of existing regulations that currently apply to financial technology, or that could apply to that market.

¹ SFIG is a member-based, trade industry advocacy group focused on improving and strengthening the broader structured finance and securitization market. SFIG provides an inclusive network for securitization professionals to collaborate and, as industry leaders, drive necessary changes, be advocates for the securitization community, share best practices and innovative ideas, and educate industry members through conferences and other programs. Members of SFIG represent all sectors of the securitization market including issuers, investors, financial intermediaries, law firms, accounting firms, technology firms, rating agencies, servicers, and trustees. Further information can be found at www.sfindustry.org.

We strongly encourage the OCC to move slowly and carefully in any regulatory efforts that might potentially restrict innovation in financial products to consumers and businesses, and the delivery of those financial products. Without specific reference to any one area of innovation, innovation in financial products has the potential to contribute to a healthy economy by helping to keep borrowing costs low and facilitating consumers' and businesses' access to credit via:

1. More variety in financial product choices to meet unique consumer and business needs.
2. More streamlined application process for credit by consumers and businesses.
3. Potentially lower cost of credit for consumers and businesses.
4. Lower transaction costs of borrowing and lending.
5. More convenient payment options.
6. Lower collection costs for delinquent and defaulted loans.
7. Increased competition among lenders in the marketplace.
8. Greater access by underserved communities to banks and financial products.
9. Greater ability of consumers and businesses to compare alternatives.

Banks play a variety of roles in financial products and markets. As the OCC considers regulatory efforts to assure the safety and soundness of banks, we believe it is critical for the OCC to avoid adopting regulations that would unnecessarily restrict innovation that could benefit U.S. consumers and businesses. We also encourage the OCC to have full transparency in its regulatory efforts.

SFIG greatly appreciates the opportunity to provide comment on the Report. We would be happy to meet with members of the OCC staff as the OCC further considers innovation.

If you have any questions or desire to discuss the matters addressed in this letter, please do not hesitate to contact me at Richard.Johns@sfindustry.org or (202) 524-6301.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Johns', written over a horizontal line.

Richard Johns
Executive Director