

Comerica Tower at Detroit Center
Corporate Legal Department
500 Woodward Avenue, MC 3391
Detroit, Michigan 48226
(313) 222-7464
(313) 222-9480 Facsimile

Julius L. Loeser
Chief Regulatory and
Compliance Counsel

By E-mail to regs.comments@federalreserve.gov

September 10, 2007

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551

Re: CRA Q & A Request for Comment
(Docket No. OP-1290)

Dear Ms. Johnson:

Comerica Bank, Detroit, Michigan, is writing to comment on the Community Reinvestment Act (CRA) new and revised Interagency Questions and Answers. Comerica Bank is a full service bank with total assets of \$58.5 billion as of June 30; it provides banking services through branch offices in Michigan, California, Texas, Florida, and Arizona.

PROPOSED NEW QUESTIONS & ANSWERS

VI. Investments in a national or regional fund.

As the primary purpose of the CRA regulation is to ensure that financial institutions reinvest in the communities from which they take deposits, Comerica supports the additional guidance via Q & A §____.22(a)(2)---2. This guidance provides that a loan or investment in a national or regional community development fund would not be considered if the activity did not meet the purpose and geographic requirements of the CRA regulation. However, it should be noted that this guidance runs counter to the premise of the new Q & A §____.12(g)---4, which allows for investments in minority-owned, women-owned and low-income credit unions even if the investment benefits an area outside of the majority-owned financial institution's CRA assessment area(s). Comerica recommends that consistency in the development of these questions be applied relative to the geography benefited.

VII. Reporting of a participation in a community development loan.

Regarding the proposed new Q & A §____.42 (b) (2) ---4, the agencies have specifically requested comment on whether having a different collection and reporting treatment for community development loans is appropriate. Comerica supports the reporting of just the purchase amount of the loan participation for community development reporting purposes. This approach eliminates the possibility of double reporting loan activity by multiple financial institutions. Additionally, reporting the purchase amount provides a more accurate accounting of the reinvestment taking place within a geography.

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PROPOSED REVISIONS TO QUESTIONS & ANSWERS

In general, Comerica supports the proposed revisions to the CRA Questions & Answers. However, regarding Q & A §____.42 (a) ---5, an additional comment has been included stating, "However, a demand loan that is merely reviewed annually is not reported as a renewal because the term of the loan has not been extended." The distinction needs to be made relative to those loans that are reviewed annually (or more frequently) and in which a credit decision has been made to continue the loans or make demand. In those circumstances where the financials have been reviewed and a credit decision has been made to continue the loans, the loans should be reported as renewals.

Thank you very much for this opportunity to express our views regarding these changes to the CRA Questions & Answers.

Best wishes,

Julius L. Loeser

Bcc: Kathryn Reid
Bonnie Cohn
Jon Bilstrom