



October 13, 2026

Travis Hill, Chair
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Jonathan V. Gould, Comptroller
Office of the Comptroller of the Currency
400 7th Street SW
Washington, DC 20219

Re: Community Reinvestment Act Regulations; OCC Docket ID OCC-2026-0694; RIN 1557-AF57; FDIC RIN 3064-AG31

Dear Chair Hill and Comptroller Gould:

Connect Humanity appreciates the opportunity to comment on the proposed revisions to the Community Reinvestment Act regulations.

Connect Humanity is a nonprofit lender and impact investor focused on expanding affordable, reliable broadband in rural, low-income, Tribal, and other historically underserved communities. We finance broadband infrastructure, work directly with communities and locally rooted providers to develop investable projects, and are pursuing CDFI certification as we expand this community development finance work.

Our experience financing broadband points to two barriers particularly relevant to this rulemaking. First, broadband projects need clear treatment as qualifying essential infrastructure across the range of ownership and financing models used in the sector. Second, many communities with the greatest broadband financing gaps have limited overlap with major-bank assessment areas, creating a geographic mismatch between communities that need capital and institutions capable of providing it.

I. Essential telecommunications infrastructure should expressly include broadband

Connect Humanity strongly supports the proposal's express recognition of essential telecommunications infrastructure as essential infrastructure. We request explicit recognition of broadband within the CRA framework. This can help bring private capital into projects that otherwise face persistent financing gaps and can help build a more durable market for broadband finance beyond time-limited public grant programs.

Reliable broadband is foundational infrastructure for economic participation. It enables access to employment, education, healthcare, financial services, entrepreneurship, government services, and other opportunities. Yet many rural, low-income, Tribal, and economically distressed communities

continue to face both inadequate broadband infrastructure and limited access to appropriately structured capital. We, therefore, encourage the agencies to clarify in the final rule or accompanying guidance that broadband infrastructure is included within “essential telecommunications infrastructure.”

Further, the proposed definition includes “essential telecommunications infrastructure” in a list that concludes with “other similar infrastructure that is provided as part of a public and private partnership.”¹ Because it is unclear whether the public-private partnership language is intended to apply only to “other similar infrastructure” or more broadly to the listed infrastructure categories, we encourage the agencies to clarify that qualifying broadband infrastructure does not need to be delivered solely through a public-private partnership.

Recommendation: The agencies should clarify that broadband is included within essential telecommunications infrastructure and confirm that qualifying telecommunications infrastructure is not conditioned on use of a public-private partnership structure.

II. Meaningful geographic flexibility can help CRA-motivated capital reach rural broadband projects outside major-bank assessment areas

Connect Humanity supports the proposal’s goal of enabling community development capital to reach communities with significant unmet needs but relatively few bank assessment areas.

Many communities in which we work face a double disadvantage: they lack adequate broadband infrastructure, and they also have little or no overlap with the assessment areas of banks capable of providing significant community development capital. That geographic mismatch can make it difficult to attract private financing even when a broadband project has a clear community development purpose and is otherwise viable. Some of the communities with the greatest infrastructure needs are also places where relatively few financial institutions have a substantial CRA footprint.

The proposal creates pathways for banks to receive consideration for qualifying community development activities outside their assessment areas once applicable standards within their own assessment areas have been met.² Connect Humanity supports meaningful geographic flexibility, but our support should not be understood as support for lowering the level of community development activity expected of banks within their own assessment areas. Geographic flexibility should supplement, rather than replace, strong community development performance where banks already operate.

Any standard used to unlock consideration for activity outside assessment areas should therefore reflect meaningful community development performance within a bank’s own assessment areas, not merely the minimum level of activity the agencies indicate would generally be expected to avoid a “Needs to Improve” rating.³

¹ Community Reinvestment Act Regulations, 91 Fed. Reg. 52114, 52135 (Aug. 12, 2026).

² Community Reinvestment Act Regulations, 91 Fed. Reg. 52114, 52139–41 (Aug. 12, 2026).

³ Community Reinvestment Act Regulations, 91 Fed. Reg. 52114, 52140 (Aug. 12, 2026); National Community Reinvestment Coalition, “CRA’s New Benchmark Could Put 85% of Current Community Development Activity at Risk” (Sept. 10, 2026). NCRC’s analysis of 69 OCC- and FDIC-supervised large banks found approximately \$102

Once that safeguard is met, however, the pathway for outside-assessment-area activity should be workable in practice. Broadband projects are often regional rather than confined to a single municipality or census tract, and networks may cross county and other jurisdictional boundaries. A qualifying rural broadband project may be ready for financing even though it lies outside the assessment areas of institutions interested in supporting community development. If the rules make outside-area consideration technically available but practically difficult to use, CRA-motivated capital may continue to concentrate in markets with significant bank presence while rural communities with demonstrated financing needs remain harder to serve.

Conversely, meaningful geographic flexibility can allow banks and specialized intermediaries to direct responsible private capital toward qualifying infrastructure projects in communities where both broadband access and conventional financing remain limited.

Recommendation: The agencies should preserve a meaningful pathway for CRA consideration of qualifying community development activity in rural and other underserved markets outside bank assessment areas, but only after a bank has demonstrated meaningful community development performance within its own assessment areas. Geographic flexibility should expand the reach of CRA-motivated capital, not reduce existing community development activity.

Conclusion

The proposed rule presents an opportunity to strengthen the role of private community development capital in financing broadband infrastructure. Done well, the final rule can help community development finance become a more durable source of broadband capital alongside — and beyond — time-limited public grant programs.

Thank you for considering these comments and the financing needs of rural and underserved communities.

Sincerely,

Brian Vo
Chief Executive Officer
Connect Humanity

billion in annual assessment-area community development lending, investments, and grants, compared with approximately \$14.8 billion if the proposed 0.625% Tier 1 capital thresholds were applied.