
**Office of the Comptroller of the Currency
Federal Deposit Insurance Corporation
Federal Reserve Board
Office of Thrift Supervision**

**Interpretive Letter #729
July 1996
12 U.S.C. 2901**

June 14, 1996

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Dear []:

This letter responds to your correspondence of May 28, 1996, which attempted to memorialize our May 8, 1996, telephone conversation. We had discussed how an institution should collect and/or report the location of small business and consumer loans, for Community Reinvestment Act (CRA) purposes, when the loans are made to borrowers with addresses consisting of post office boxes.

During our conversation, I understood that we were discussing the situation, which may occur in rural areas, in which small businesses or consumers have no street addresses and, thus, can provide their lenders with only rural route numbers and box numbers or post office box numbers. In such instances, institutions should geocode the locations* of these loans by town, state, and zip code. The location of the post office will serve as a proxy for the location of the small business or consumer.

In most cases, however, small businesses and consumers have street addresses in addition to post office box numbers or rural route and box numbers. Generally, institutions should ask their customer to provide, in the case of a small business or farm loan, the street address of the

* Institutions that are required to collect and, for some types of loans, report loan information must collect and report the "loan location." "Loan location" is defined in 12 C.F.R. §§ 25.12(p), 228.12(p), 345.12(p) & 563e.12(o). A loan is located in a "geography," which means "a census tract or block numbering area delineated by the United States Bureau of the Census in the most recent decennial census." 12 C.F.R. §§ 25.12(l), 228.12(l), 345.12(l), & 563e.12(k). Institutions subject to the data collection and reporting provisions, therefore, must geocode loan locations by census tract or block numbering area.

main business facility or farm or location where the loan proceeds otherwise will be applied and, in the case of a consumer loan, the street address of the residence of the borrower. See 12 C.F.R. §§ 25.12(p)(1) & (3), 228.12(p)(1) & (3), 345.12(p)(1) & (3), and 563e.12(o)(1) & (3).

Once the institution receives the information that the customer provides, it should collect, geocode and report the loan location based on the information that is provided by the customer. If a customer does not provide a street address, the institution may collect and report based on the information, e.g., the post office box or rural route and box number, that the customer provided.

As you know, the four bank and thrift supervisory agencies have promulgated substantively identical CRA regulations. Therefore, staff from all of the agencies have considered your issue, and they concur in the opinions expressed in this letter.

I hope this letter clarifies my advice. You may also be interested to know that the staffs of the four agencies are presently developing written guidance to assist in resolving interpretive questions arising under the new CRA regulations. In the meantime, if you have any further questions, please feel free to call me at (202) 874-5750.

Sincerely,

/s/

Matthew Roberts
Director
Community and Consumer Law Division
Office of the Comptroller of the Currency