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Date: May 1, 2019 at 8:22:33 AM EDT

To: pilotprogrqm@occ.treas.gov

Subject: Innovative Pilot Program

Ladies and Gentlemen,

Based on my former experience as a CEO of a small bank attempting to introduce innovative products to the general public across state lines, I find this interesting, if not unbelievable. However, it will only work if your EIC's understand it and buy into it....and this is probably where it will fail.

Generally, your examiners, and junior examiners, are 'by the book' professionals who work to stifle innovation and suppress...and more importantly discourage...innovation.

Sorry for the criticism, but whomever came up with this program I am sure is aware of the day to day hurdles that the current examination process places on banks, particularly small banks which are hard-pressed to meet even the current regulations, let alone all the new rules and stipulations that I am sure this program will place on them.

I look forward from a distance to see how this program fares..but I cynically doubt success.

Sincerely,

Thomas W . Lynn