

## **ABA Statement/Request to OCC Mutual Saving Association Advisory Committee**

The American Bankers Association appreciates the OCC's efforts to address concerns raised by ABA and others regarding the process for reviewing applications for liquidation involving mutual institutions supervised by the OCC. We believe that greater transparency around the process for review and disposition of such applications will benefit everyone by providing a clearer understanding of the specific issues involved and considered by the OCC when taking action on proposed liquidation applications.

While OCC has been responsive to the concerns ABA and others have raised, we believe it would be beneficial for OCC to issue a public statement that articulates in one document the review process and matters considered. Specifically, we recommend that the policy statement address the key considerations taken by OCC when reviewing a proposed liquidation of a mutual bank or savings association or similar transaction, including efforts to ensure no conflicts of interest in the transaction. We also ask that the policy statement reiterate that initiation of such a transaction is a judgment for the institution's board. Also, particularly for any transaction that does not involve a supervisory liquidation (which we recognize must be considered differently) a clear statement of the considerations and guardrails applied will help to alleviate concerns that such transactions might be used inappropriately or in a fashion that does not serve the best interests of a mutual institution's stake-holders as determined by governing regulation. Thank you.