

Fax**METRO BANK**

2901 West Broadway
 Louisville, KY 40211
 Phone (502) 778-7000
 Fax (502) 775-5232

Date:2/6/12**To:**CDFI/Robert Obaney**From:**Pedro Bryant**Phone:****Phone:**(502) 775-2555**Fax:**(202) 622-7754**Fax:**(502) 775-5232**Subject:**NMTC Program**Pages:**2 (including cover)**COMMENTS:**

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**LOUISVILLE DEVELOPMENT
BANCORP**

February 6, 2012

Mr. Robert Ibanez, Manager
NMTC Program
CDFI Fund
U. S. Department of the Treasury
601 Thirteenth St., NW
Suite 200 South
Washington, DC 20005

RE: New Markets Tax Credit Program

Dear Bob:

Thank you for the opportunity to provide comments to the CDFI Fund regarding efforts to increase the efficiency of the NMTC effectiveness, while reducing cost and burden on program participants.

The NMTC Program was established to spur new or increased investments into operating businesses and real estate projects located in low-income communities. The NMTC Program attracts investment capital to low-income communities by permitting individual and corporate investors to receive a tax credit against their Federal income tax return in exchange for making equity investments in specialized financial institutions called Community Development Entities (CDEs).

We believe that at this time there should be **no changes** to any of the following areas regarding the NMTC Program:

- Census Tract Eligibility and Commitment to Areas of Higher Distress
- Treatment of certain businesses
- Community Accountability
- Transaction Costs
- Evaluation of Financial Products
- Use of other Federally subsidized financing in conjunction with NMTCs

The NMTC Program is still rather young and while there are elements of the program that we do not agree with, there are others that we do agree with. We believe that the CDFI Fund can preserve public policy objectives and safeguards by not making any changes at this time. We would encourage the Fund to continue collecting data and information and consider changes after there have been five to seven full NMTC compliance periods. At the earliest this would put the Fund in a position to consider changes in 2015 to 2017. This would provide the Fund with more data to consider all opportunities and areas for improvement in a few short years.

Sincerely,

A handwritten signature in black ink, appearing to read "Pedro A. Bryant", written in a cursive style.

Pedro A. Bryant
President & CEO