



November 12, 2018

Mr. Daniel Upham
Acting Director, Office of Economic Opportunity
Ms. Dianna Seaborn
Director, Office of Financial Assistance
U.S. Small Business Administration
409 Third Street SW.
Washington, DC 20416

Re: *Notice of Extension of and Changes to Community Advantage Pilot Program and Request for Comments*, SBA docket number SBA-2018-0008

Dear Mr. Upham and Ms. Seaborn:

The National Association of Government Guaranteed Lenders (NAGGL) appreciates the opportunity to provide formal comments regarding the Community Advantage Pilot Program.

As we indicated in our 2016 letter on this topic, NAGGL strongly supports the efforts of the U.S. Small Business Administration (SBA) to expand access to capital for small businesses in underserved markets. In this regard, we continue to believe that the Community Advantage Pilot Program has the potential to assist in meeting this important objective. Therefore, we support the actions taken by SBA, as described in the Federal Register Notice, that are intended to give the Community Advantage Pilot Program more time to serve more borrowers in underserved markets, further refine and improve the Pilot, and mitigate any risks that may be identified during the Pilot period.

Of special note is the additional 30-month extension to the Community Advantage Pilot Program. We believe this extension will provide an appropriate additional period for SBA to continue its evaluation of program performance – both how well it is serving its intended markets, and also the nature and extent of the risk attached to the program – and to make appropriate additional modifications with the long term goal of assuring the greatest chance for success if the Community Advantage Pilot Program is made permanent.



In addition to expressing its support for the Community Advantage Pilot Program, NAGGL also wants to reiterate that the association and its members stand ready to support the agency and the Pilot in any way that we can, including working with you to provide Community Advantage lenders and other interested parties with information, training, etc.

Thank you again for providing this opportunity to make the NAGGL's viewpoint known to SBA.

Sincerely,

A handwritten signature in black ink that reads "Anthony R. Wilkinson". The signature is written in a cursive style with a large initial "A" and "W".

Anthony R. Wilkinson
President and Chief Executive Officer

cc: William Manger, AA/OCA