

July 10, 2020

Christopher Kirkpatrick
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st St. NW
Washington, DC 20581

Regarding: RIN 3038-AE33
Swap Clearing Requirement Exemptions

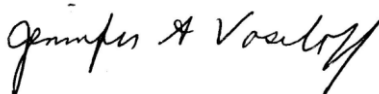
Dear Mr. Kirkpatrick:

Opportunity Finance Network (OFN) appreciates the opportunity to comment on the proposed rule regarding Swap Clearing Requirement Exemptions. OFN is a national network of 311 CDFI (community development financial institution) member institutions. CDFIs are mission-driven lenders and investors operating in our nation's low-income and low-wealth communities.

OFN strongly supports the Supplemental Proposal of Proposed Rulemaking regarding Community Development Financial Institutions which exempts CDFIs from the Clearing Requirement. We commend the Commission for recommending that current policy as outlined in a January 8, 2016 letter to a coalition of OFN members be formalized in regulation.

The proposed exemption will save CDFIs the expense of clearing swaps through a third-party clearinghouse, allowing more of their resources to be devoted to their community development mission. We wish to associate ourselves with the more extensive comments submitted on behalf of Capital Impact Partners, Enterprise Community Loan Fund, Low Income investment fund, IFF, Reinvestment Fund and Self-Help Ventures Fund.

Sincerely,



Jennifer A. Vasiloff
Chief External Affairs Officer

CC: Laura Benedict, Self-Help Ventures Fund
Ellis Carr, Capital Impact Partners
Lori Chatman, Enterprise Community Loan Fund
Don Hinkle-Brown, Reinvestment Fund
Dan Nissenbaum, Low Income Investment Fund
Joe Neri, IFF