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**By electronic delivery to:**

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Re: Loans in Areas Having Special Flood Hazards; RIN 1557-AD67; RIN 7100AE-00; RIN 3064-AE03; RIN 3052-AC93; RIN 3133-AE18

Dear Federal Agencies:

The Pennsylvania Bankers Association represents 154 financial institutions of all sizes operating in the Commonwealth of Pennsylvania. PBA appreciates this opportunity to offer its views on the complex and far-reaching impacts of the Biggert-Waters Act's changes regarding flood insurance. These changes impact this Commonwealth's residents, communities, local governments and our member financial institutions which seek to serve their needs.

PBA wishes to register its support for the comments jointly filed by the American Bankers Association, the Consumer Bankers Association and the American Bankers Insurance Association on this issue.

In particular, we urge your agencies to work with the Federal Emergency Management Agency (FEMA) in updating and maintaining the currency of the *Mandatory Purchase of Flood Insurance Guidelines* - a document which is key to our members' and their customers' understanding their flood insurance obligations.

Sincerely,

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