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March 15, 2021

VIA E-Apps

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VIA Email

Carolina M. Ledesma
Acting Director for Large Bank Licensing
Office of the Comptroller of the Currency
400 7th Street, SW
Washington, DC 20219

Re: Application by Huntington Bancshares Incorporated
to Acquire TCF Financial Corporation

Dear Mr. Schilling and Ms. Ledesma:

This concerns the response to public comments (the "Response") that we provided to you on February 22, 2021, regarding (a) the application seeking the prior approval of the Board of Governors of the Federal Reserve System for Huntington Bancshares Incorporated to acquire by merger TCF Financial Corporation and (b) the application seeking the prior approval of Office of

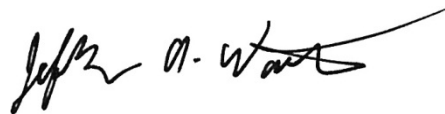
R. Ryan Schilling
Carolina M. Ledesma
March 15, 2021
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the Comptroller of the Currency to merge TCF National Bank with and into The Huntington National Bank ("Huntington Bank").

Page 9 of the Response included a discussion of Huntington Bank's home mortgage originations in the Detroit MD and in the city of Detroit. We recently noticed that some sentences in that discussion inadvertently listed *loan application* data instead of *loan origination* data. Please find enclosed a replacement page 9 with the correct data. We apologize for any inconvenience this may have caused.

If you have any questions about this submission or need additional information, please do not hesitate to contact Richard Kim at 212/403-1354 or me at 212/403-1330.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey A. Watiker", with a long horizontal flourish extending to the right.

Jeffrey A. Watiker

JAW:mlg
Enclosure

R. Ryan Schilling
David Reilly
February 22, 2021
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Detroit, JP Morgan holds 63.3% of deposits with 18 branch locations and Comerica holds 29.4% of deposits with 19 branch locations.

B. Huntington's Home Mortgage Lending Record

Between January 1, 2016 and December 31, 2020, the time period since Huntington Bank's last Community Reinvestment Act ("CRA") evaluation assessment period, Huntington Bank originated or purchased 6.5% (885 of 13,624) of the home mortgage loans in the city of Detroit even though Huntington Bank has less than 1% of the market deposits in the city of Detroit. Of these 885 mortgage loans, 16.7% were to individuals in low-income census tracts and 44.7% of these loans were to individuals in moderate-income census tracts. These percentages approximated or, in the case of lending to moderate-income census tracts, significantly exceeded aggregate industry lending percentages in the market. During this same time period, Huntington Bank originated or purchased 3,983 home mortgage loans in the Detroit MD. Of these 3,983 mortgage loans, 5.1% were to individuals in low-income census tracts and 15.8% of these loans were to individuals in moderate-income census tracts. These percentages are more than double the aggregate industry lending percentages for home mortgage lending to LMI census tracts in the Detroit MD. Moreover, Huntington Bank does not purchase loans for the purpose of meeting its CRA obligations—loans recorded as purchases on the Home Mortgage Disclosure Act ("HMDA") LAR were acquired through Huntington Bank's normal course of business from correspondent lenders.

Huntington Bank also has a strong home mortgage lending record with borrowers who identify as Hispanic, Black and African-American in the city of Detroit and the Detroit MD. For example, in 2018, Huntington Bank originated or purchased 0.9% (1 of 117) of all home mortgage loans to borrowers who identified as Hispanic and 9.66% (146 of 1,512) to individuals who identified as Black or African-American in the city of Detroit. In 2019, Huntington Bank originated or purchased 6.82% (12 of 176) of all home mortgage loans to borrowers who identified as Hispanic and 6.5% (113 of 1,733) to individuals who identified as Black or African-American in the city of Detroit. Huntington Bank's lending to Hispanic, Black or African-American borrowers in the city of Detroit in 2018 and 2019 exceeded the lending numbers of many of Huntington Bank's in-market competitors even though Huntington Bank has less than 1% of the market deposits. Huntington Bank ranked second in the city of Detroit for home mortgage lending to individuals in majority minority ("MM") census tracts in 2018 and ranked third in 2019. If Huntington Bank and TCF Bank (and previously Chemical Bank) are combined, they would have been by far the largest lender to MM census tracts in 2018 and 2019. Additionally, the combined percent of applications submitted to either Huntington Bank or TCF Bank by Hispanic, Black or African-American borrowers in the city of Detroit that were denied is significantly less than the percent of denied applications to the same populations by the aggregate industry in both 2018 and 2019.

In 2018, Huntington Bank originated or purchased 2.32% (32 of 1,382) of home mortgage loans to borrowers who identified as Hispanic and 5.53% (221 of 3,998) to individuals