Extension Request - National Bank Chartering

COMMENT LETTER

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January 13, 2026
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Chief Counsel's Office
Attention: Comment Processing, Office of the Comptroller of the Currency
400 7th Street, SW, Suite 3E-218
Washington, DC, 20219

Attention: Comments (OCC-2025-0768)

Re: National Bank Chartering (RIN 1557-AF47)

The Conference of State Bank Supervisors ("CSBS")1 requests that the Office of the Comptroller of the Currency ("OCC") extend the comment deadline for the notice of proposed rulemaking entitled "National Bank Chartering"2 ("proposal") for an additional 60 days. CSBS and its members are actively reviewing the proposal, which raises significant legal and policy questions regarding the scope and purpose of the national trust charter, and the additional time is necessary and warranted to facilitate a comprehensive analysis and thoughtful response.

CSBS develops policy through a structured consensus process to help ensure that its policy positions reflect the perspectives of state regulators nationwide. This process requires deliberation among members which may not be feasible under the 30-day comment period, particularly given the number of complex federal policy proposals already under consideration, including concurrently running comment periods on other OCC proposals of critical importance to state regulators. Given the serious policy issues raised by the proposal and its impact on the financial ecosystem, CSBS respectfully requests that the OCC extend the comment period by an additional 60 days.

Sincerely,

Brandon Milhorn
President and CEO

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