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**MEMO**

From: Kenneth H. Thomas, Ph.D.

To: [Comments@FDIC.gov](mailto:Comments@FDIC.gov)

Date: April 12, 2022

Re: Comment on RIN 3064-ZA31 Regarding Rules, Regulations, Guidance, and Statement of Policy on Bank Merger Transactions

Please consider this my comment on the very specific area of a proposed alternative to current HHI-based metrics.

The details of my recommended alternative (the New Era approach using the "Market Domination Index") are found on pages 117 and 118 of The CRA Handbook (McGraw Hill, 1998), which is available online and summarized at [www.CRAHandbook.com](http://www.CRAHandbook.com).

Thank you.