

September 5, 2025

Via electronic submission: <https://www.regulations.gov>

Federal Housing Finance Agency  
400 7th Street SW  
Washington, DC 20219  
Attn: Comments/RIN 2590-AB53

**RE: Comment on the FHFA Repeal of the Fair Lending, Fair Housing, and Equitable Housing Finance Plans regulation.**

To Whom It May Concern:

This letter is being submitted by International Bancshares Corporation (“IBOC” or “IBC”), a publicly traded, multi-bank financial holding company headquartered in Laredo, Texas. IBC maintains 166 facilities and 256 ATMs, serving 75 communities in Texas and Oklahoma through five separately chartered banks ranging in size from approximately \$490 million to \$9.5 billion, with consolidated assets totaling over \$16 billion. IBC is one of the largest independent commercial bank holding companies headquartered in Texas.

IBC appreciates the opportunity to comment on the Federal Housing Finance Agency’s (“FHFA”) proposal to repeal 12 CFR Part 1293, which governs Fair Lending, Fair Housing, and Equitable Housing Finance Plans. Federal Deposit Insurance Corporation (“FDIC”) is the primary federal regulator of IBC Banks, and the Federal Reserve Board (“FRB”) is the primary federal regulator of IBOC.

IBC supports the proposed repeal of the FHFA rule because the underlying Fair Lending statutes are self-implementing and are administered by other federal agencies with direct jurisdiction, making the FHFA rule unnecessary. IBC is strongly committed to continued compliance with Fair Lending statutes, including the Fair Housing Act and Equal Credit Opportunity Act (ECOA). IBC recommends that the relevant federal agencies issue guidance reaffirming the continued validity of community outreach efforts as an important element of Fair Lending compliance.

As a minority-owned institution, IBC has a long history of serving diverse communities throughout Texas and Oklahoma. Our approach to fair lending is grounded in race-neutral principles, and we believe that access to credit should be based on objective, non-discriminatory criteria.

IBC urges FHFA to consider the limitations of peer-based statistical comparisons as a basis for supervisory determinations. Analyses that rely solely on peer metrics may misrepresent the lending practices of institutions that serve unique markets or offer specialized products. Such approaches

can inadvertently pressure institutions to adjust behavior based on relative metrics, rather than actual evidence of discriminatory conduct. We encourage FHFA to ensure that any regulatory framework recognizes the diversity of business models and market conditions across the industry.

IBC acknowledges the evolving legal and regulatory landscape surrounding Special Purpose Credit Programs. While these programs have historically supported access to credit in underserved areas, recent federal directives—including FHFA’s own order to terminate SPCP support—suggest that their future use may require additional legal clarity.

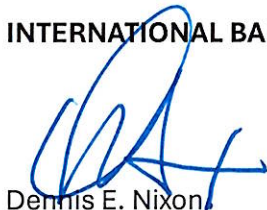
IBC supports FHFA’s proposal to repeal 12 CFR Part 1293, particularly provisions that duplicate existing statutory obligations or create confusion with other agencies’ jurisdiction. We agree that fair lending enforcement should remain grounded in clear statutory authority and race-neutral principles. Eliminating redundant or conflicting requirements will help reduce unnecessary compliance burdens and promote regulatory clarity.

IBC encourages FHFA to issue guidance affirming that institutions may pursue fair lending objectives through race-neutral means without triggering disparate impact liability. Clear standards would help institutions maintain compliance while continuing to serve underserved communities effectively.

Thank you for the opportunity to provide these comments. IBC appreciates FHFA’s efforts to modernize and streamline the regulatory framework and looks forward to continued engagement on these important issues.

Sincerely,

**INTERNATIONAL BANCSHARES CORPORATION**



Dennis E. Nixon,  
President and CEO