

From: micmcrc@aol.com
Sent: Monday, June 12, 2006 11:04 AM
To: Comments, Regs
Subject: 2006-17 Q & A for CRA

Chief Counsel's Office
Office of Thrift Supervisor
1700 G. Street NW
Washington DC 20552

RE: Attention No. 2006-17

To whom it may concern:

The Michigan Community Reinvestment Coalition (MCRC) a membership organization formed to monitor financial institutions Community Reinvestment Act activities in the state of Michigan appreciates that you are proposing to make the OTS' definition of community development consistent with the definition of the other banking agencies. We believe that, if implemented rigorously, that the proposed changes to community development will benefit low and moderate income families in rural areas and communities recovering from disaster areas.

Just like the three banking agencies, the OTS has amended its CRA regulation to provide CRA points for thrifts if they finance community development in designated disaster areas and middle income census tracts in distressed and underserved rural counties. Also just like the three other agencies, the OTS' proposed questions and answers (Q & A's) clarify that more CRA points will be awarded for financing community development if the community development meets the needs of low and moderate income families.

MCRC urges the OTS to modify its recent changes to the CRA exams and regulations for saving and loans above \$250 million in assets. Uniform exams and regulations are very important to establish consistent expectations of rigorous CRA exams regardless of the charter held by a depository institution. Uniform exams and regulations had been the standard for all CRA's history until the last couple of years. We urge the OTS to go back to a uniform standard.

Thank you for this opportunity to comment.

Sincerely,

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cc: MCRC Board of Directors

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