

From: Bethany Sanchez [bethany_sanchez@hotmail.com]
Sent: Thursday, June 08, 2006 4:48 PM
To: Comments, Regs
Cc: jtaylor@ncrc.org; jsilver@ncrc.org
Subject: No. 2006-17

June 8, 2006

Regulation Comments

Chief Counsel's Office

Office of Thrift Supervision

1700 G St. NW

Washington DC 20552

RE: Attention No. 2006-17

To Whom it May Concern:

I am writing on behalf of the Metropolitan Milwaukee Fair Housing Council (MMFHC), a private, nonprofit, membership-based civil rights organization, to applaud your proposal to make the OTS' definition of community development consistent with the definition of the other banking agencies. We believe that, if implemented rigorously, the proposed changes to community development will benefit low and moderate income families in rural areas and communities recovering from natural disasters.

In an effort to further establish consistency with the banking agencies, MMFHC strongly urges that the OTS modify its recent changes to the CRA exams and regulations for savings and loans above \$250 million in assets. When Director John Reich addressed NCRC's annual conference in March, Director Reich indicated that the OTS is seriously considering making its CRA exams and regulations consistent with the recent changes of the banking agencies. 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 of 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 on the proposed changes.

Sincerely,

Bethany Sanchez
Director, Community and Economic Development
Metropolitan Milwaukee Fair Housing Council
600 E. Mason, Suite 200
Milwaukee, WI 53202
414/ 278-1240, x22
www.fairhousingwisconsin.com
Board member, National Community Reinvestment Coalition www.ncrc.org

cc. NCRC