



New York Housing Conference

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Carol Lamberg, Staff Director

June 9, 2006

Office of Thrift Supervision
Chief Counsel's Office
1700 G Street, NW
Washington, D.C. 20552

Re: Docket No. 2006-17

Dear Sir or Madam:

On behalf of the New York Housing Conference (NYHC), I appreciate the opportunity to comment on the agency's April 12, 2006 proposal to revise guidance relating to the Community Reinvestment Act.

The New York Housing Conference is a coalition of nonprofit and profit-motivated housing organizations, professionals, lenders and others committed to low and moderate income housing opportunities in New York.

We appreciate your recent CRA proposal that allows all thrifts to receive favorable CRA consideration for Katrina relief, recovery efforts and rebuilding if they are satisfactory or above in assessment areas. We also appreciate OTS' flexibility and support to the disaster along the Gulf Coast.

However, we are concerned that OTS has not regularized its CRA rules with the other three agencies, the FDIC, the OCC and the Federal Reserve. The joint rule issued by these agencies creates an expanded definition of community development and supplies banks with additional flexibility in fulfilling CRA requirements. Furthermore, the unified rules ensure that low- and moderate-income individuals and communities continue to be served by the banks in their community. Two critical components of the joint rule: 1) requires banks with between \$250 million and \$1 billion in assets to support their communities through meaningful services and community development loans and investments; 2) and reinforces the fact that some lending practices can count against an institution in a CRA exam. Joining these agencies in this rule is critical to maintaining OTS' commitment to supporting and servicing underserved communities. This is especially critical in the wake of rebuilding the Gulf Coast after the hurricane disaster. We ask that OTS join the other three agencies in their joint rule.

The New York Housing Conference is pleased to be able to submit these comments. If further information would be helpful, please feel free to contact us.

Sincerely,

Clara Fox
Co-Chair

John Kelly
Co-Chair

Carol Lamberg
Staff Director