SOBER LIVING NETWORK

(15)

June 26, 2000

Manager, Dissemination Branch
Information Management & Services Division
Office of Thrift Supervision
1700 G Street NW
Washington DC 20552

Attention: Docket No. 2000-44

The Sober Living Network wishes to comment on the proposed rule regarding disclosure and reporting of Community Reinvestment Act (CRA) agreements as mandated by the Gramm-Leach-Bliley (GLB) Act. We thank the federal bank regulatory agencies for taking steps in the proposed rule to reduce the burden of complying with the rule on community development organizations and other affected parties.

Sober living housing provides congregate housing for recovering alcoholics, addicts, and family members in a healthy and safe alcohol & drug free recovery conducive environment. Sober living is supportive housing that does not provide formal recovery and/or treatment services. Sober housing operates in a cost efficient manner as a major portion of management tasks performed by residents with a democratic resident council.

Regulators face a difficult task in developing regulations implementing ill-conceived and ill-defined provisions of the aforementioned Act. The "sunshine" provisions are intended to prevent community groups from "extorting" financial commitments from banks in return for pledges not to criticize banks' CRA lending performance. We do not believe any such extortion is actually happening.

The provisions will undermine the very heart of the CRA by discouraging dialog between banks and the public about whether banks are meeting the credit needs of the communities in which they do business. If implemented in their proposed form, these provisions threaten to curtail bank investment in distressed urban and rural neighborhoods. Our mission to revitalize our community and the similar missions of thousands of organizations nationwide will become much harder to achieve.

Sincerely,

Ken Schonlau

Ken Schonlau, Project Director