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**LATIN UNITED COMMUNITY
HOUSING ASSOCIATION**

July 6, 2000

Manager
Dissemination Branch
Information Management & Services Division
Office of Thrift Supervision
1700 G Street NW
Washington, DC 20552
Att: Docket No: 2000-44

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DISSEMINATION BRANCH
2000 JUL 24 P 12:06

To Whom it May Concern:

As a leader of a community development corporation, I urge you to make significant changes in the proposed Community Reinvestment Act "Sunshine" regulation that are threaten investment in my community and punish us for discussing the community's credit needs. We understand that the financial institution have used this regulation as an excuse to not enter into community investment agreements, given the increasing trend of consolidation by our nation's financial institutions, the integrity of the CRA as a voice for underserved communities must be maintained. We would like to recommend that the following changes be implemented immediately:

CRA Contacts:

The regulation must cover discussion and not provide exemptions for bank or regulator initiated contacts. To narrow the definition of CRA contacts in any way could create the perception of favoring certain types of CRA discussions by exempting them from the reporting requirements.

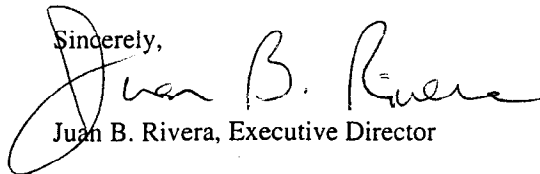
With a broad definition of CRA contacts the time frame must be constrained to ensure that there is truly impact on CRA related performance. Only CRA contacts that occurred twelve months or less prior to a CRA agreement, particularly during CRA examinations and applications for merger or acquisition, the three month after the agreement is reached should also be counted.

Reporting Requirements;

To minimize the reporting burden the reporting requirements should be satisfied by existing reports wherever possible including reports to other funders if the grant is used for the purposed and where there where is a reporting requirement triggered by multiple small grant, allowing the IRS Form to suffice. A consolidated report should be allowed where an organization has two or more agreements.

We appreciated that the federal banking agencies had a difficult task of developing regulation for a confusing statue and respect the steps that have already been taken to reduce burden for neighborhood organizations, banks and other parties interested in community development. We urge the federal agencies to adopt our suggestions for streamlining the sunshine regulation and reduce the potential damage they may cause to revitalizing inner city and rural communities.

Sincerely,



Juan B. Rivera, Executive Director