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Washingtonville Housing Alliance  
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Manager, Dissemination Branch  
Information Management Services Division  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552  
Attention Docket No. 20000-44

Dear Office of Thrift Supervision:

I am the Executive Director of the Washingtonville Housing Alliance (WHA), a not-for-profit affordable housing developer in Mamaroneck, New York. During our twenty year history, we have created more than one hundred affordable housing units for residents of Westchester County. All of our projects have included public and private financing, and bank lending has been essential to their successful completion.

The Community Reinvestment Act (CRA) plays an important role in encouraging banks to lend to affordable housing projects. I oppose any efforts to weaken the CRA and am thus concerned about the effect that the so-called "CRA Sunshine" law will have. I am worried that the CRA Sunshine Law will chill advocacy groups from pressing banks to improve their CRA records and that banks will not lend to affordable housing projects sponsored by groups like WHA because they do not want to be subject to disclosure requirements. I am also worried that the reporting requirement will place undue burdens on our organization's limited resources.

With these concerns in mind, I ask the federal banking agencies to take the following steps to limit the negative impact of the CRA Sunshine Law. First, because the CRA Sunshine Law affects free speech, I ask the federal banking agencies to refrain from implementing the law until it receives an opinion from the Justice Department's Office of Legal Counsel regarding the law's constitutionality. Second, if the agencies go ahead and implement the Sunshine Law, they should require disclosure only of agreements that will result in an increase in the bank's CRA-related loans, investments, and services. Finally, the agencies should adopt a rule permitting the required disclosure to be made through IRS Form 990.

Although I oppose implementation of the Sunshine Law, I believe these changes will limit its negative impact. Thank you for consideration of my comments.

Yours truly,

Ellen Levy  
Executive Director