

N A A H L

NATIONAL ASSOCIATION OF AFFORDABLE HOUSING LENDERS

CELEBRATING 30 YEARS OF SUCCESSFUL COMMUNITY INVESTMENT

NAAHL GOLD MEMBERS

*Bank of America
Century Housing
Countrywide Home Loans
Harris Bank
JPMorganChase
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Investment Corporation
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Washington Mutual Bank
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CITIGROUP
HSBC Bank USA
LaSalle Bank Corporation
Merrill Lynch Community
Development Company
National City Bank
NeighborWorks America
The Northern Trust Company*

NAAHL BRONZE MEMBERS

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Reinvestment Corporation
CharterMac
Community Investment Corporation
Enterprise
FHLBanks
Local Initiatives Support Corporation/
National Equity Fund
Low Income Investment Fund
Neighborhood Lending Partners
Ohio Capital Corporation for Housing
ShoreBank*

President & CEO
Judith A. Kennedy

January 9, 2007
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552
Re: Docket No. 2006-44

The National Association of Affordable Housing Lenders (NAAHL) represents America's leaders in moving private capital to those in need – 200 organizations committed to increasing private capital lending and investing in low-and moderate-income (LMI) communities. Members are the “who's who” of private sector lenders and investors in affordable housing and community development: banks, thrifts, loan consortia, local and national nonprofits, mortgage companies, financial intermediaries, pension funds, and foundations.

We appreciate the opportunity to submit comments on the agency's Notice of Proposed Rulemaking (NPR), published November 24, 2006, which proposes to align OTS' Community Reinvestment Act (CRA) regulations with those of the Office of the Comptroller of the Currency (OCC), the Federal Reserve, and the Federal Deposit Insurance Corporation (FDIC).

We strongly support alignment with the three other agencies. The CRA has been vital to building emerging markets nationwide. Lending and equity investing in underserved communities have already spurred economic growth and demand, thereby increasing opportunities to make more loans and sell more services. Consistency among the regulators helps the communities and insured institutions to maximize these opportunities. It also prevents a regulatory “race to the bottom.”

The FDIC, the OCC, and the Federal Reserve have jointly issued a rule that expands the definition of community development, and also: 1) requires all banks to support their communities through meaningful services and community development loans and investments; 2) reinforces the fact that some lending practices can count against an institution in a CRA exam. The joint rule allows banks more leeway in fulfilling CRA requirements and ensures that LMI individuals and communities continue to be well served by the banks that operate in their area.



We urge the OTS to join the other three agencies in their joint rule.
If we can answer any questions or provide additional assistance regarding our comments, please do not hesitate to contact us.

Sincerely,

Judy Kennedy