

Susan Holman
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Director John M. Reich
1700 G St., N.W.
Washington, DC 20552

Dear Director Reich:

I believe that the proposed changes to the Community Reinvestment Act (CRA) exams will increase lending, investing and bank services to low and moderate income communities. I urge your agency to implement the proposed changes as soon as possible.

The federal agencies must establish the same CRA exams so that the public can effectively compare the CRA performance of banks and thrifts. Currently, banks and thrifts with similar assets in my area have very different CRA exams. Consistent CRA exams make it more likely that regulatory agencies, and the public, can hold banks and thrifts accountable for serving a community's needs. Today's different CRA standards increase the possibility of some lending institutions shirking their community reinvestment obligations.

Additionally, I ask the OTS to add an anti-predatory lending screen to CRA regulations. Savings and loans must be severely penalized - through lower CRA ratings - if they engage in illegal, discriminatory, and abusive lending practices. Again, savings and loans must be held to the same standard as banks. This includes CRA penalties if they issue abusive loans that drain equity from communities.

I ask the OTS to enact the proposal to align their CRA exams with those of other agencies as fast as possible.

Sincerely,

Susan Holman