

Docket No. 04-06  
 Communications Division  
 Public Information Room, Mailstop 1-5  
 Office of the Comptroller of the Currency  
 250 E St. SW,  
 Washington 20219

Robert E. Feldman  
 Executive Secretary  
 Attention: Comments  
 Federal Deposit Insurance Corporation  
 550 17th St NW  
 Washington DC 20429

Docket No. R-1181  
 Jennifer J. Johnson  
 Secretary  
 Board of Governors of the Federal Reserve  
 System  
 20th Street and Constitution Avenue, NW  
 Washington DC 20551

Regulation Comments, Attention: No. 2004-04  
 Chief Counsel's Office  
 Office of Thrift Supervision  
 1700 G Street NW  
 Washington DC 20552

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April 2, 2004

Dear Officials of Federal Bank and Thrift Agencies:

As a banking customer I would like to urge you to change your proposed Community Reinvestment Act (CRA) regulation before finalizing it. I believe you need a stronger predatory lending standard and I believe you should keep the small bank definition as it is at \$250 million in assets.

I hate lenders who do what you call "asset-based lending" and try to force borrowers into foreclosure so they can take over their homes. However, there are a whole bunch of other ways that seemingly good banks take advantage of customers who don't understand the loan process. I think the regulators should use the CRA exams to penalize lenders who push high cost loans with high fees and those who get you into a bad loan and then try to flip you into an even worse loan. I hate prepayment penalties that keep you from getting out of a bad loan and single premium credit insurance policies that cost a lot but don't really help the customer. Lower a bank's CRA rating when they do stuff like that.

The big banks are getting so big that they have lost touch with communities and working class families, so I hope you will pay more attention to the smaller banks. They can do more if the regulators would only encourage the larger of the small banks to support community development lending and investments in smaller communities. Here in Springfield the smaller "community" banks do nothing in community development. Continuing to use the large bank CRA exam to examine the larger of the small banks will do more to encourage reinvestment in the community than letting them take the small bank exam does. I'm asking you not to raise the asset threshold definition of a small bank.

I also support the positions of the National Community Reinvestment Coalition. Thank you very much for paying attention to my concerns.

Sincerely,



Joyce J. Probst

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 Springfield, IL 62704