



CITY of
Platteville
 HOUSING DIVISION

Community Development &
 Platteville Housing Authority

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

Dear Officials of the Office of Thrift Supervision:

As Chair of the Platteville Housing Authority and a member of the Platteville Community Development Board, 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. Wisconsin would be hard hit by the proposed changes in requirements for small banks.

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. Keeping them on the large bank CRA exam will do more to encourage reinvestment in the community than letting them take the small bank exam does. I am asking you not to raise the asset threshold of a small bank.

The proposed changes to CRA will directly undercut the Administration's emphasis on minority homeownership and immigrant access to jobs and banking services. The proposals regarding streamlined exams and the anti-predatory lending standard threaten CRA's statutory purpose of the safe and sound provision of credit and deposit services. The proposed data enhancements would become much more meaningful if the agencies update procedures regarding assessment areas, affiliates, and the treatment of high cost loans and purchases on CRA exams. CRA is simply a law that makes capitalism work for all Americans. CRA is too vital to be gutted by harmful regulatory changes and neglect.

Thank you for your attention to this critical matter.

Sincerely,

Marilyn Gottschalk
 Housing Authority Board Chair

Xc: National Community Reinvestment Coalition
 President George W. Bush
 Treasury Secretary John W. Snow

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