



NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE
NORTH S.D. COUNTY BRANCH · P.O. BOX 5786 · OCEANSIDE, CA 92052

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

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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

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

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

April 2, 2004

Dear Officials of Federal Bank and Thrift Agencies:

As president of the North San Diego County NAACP, I strive to support community activities that empower underserved community members with the knowledge necessary to improve their social and economic status. This mission, requires the support of community based organizations, government, and the business community. The CRA is a key government act making it mandatory for Banks to consider underserved communities when they make banking policies. While some of our banking partners are gracious with banking services and training, if you weaken the CRA regulations, you will make it easier to forget about underserved communities when future decisions are made.

The NAACP does a report card on the banking industry. The best scores are in the areas covered by the CRA. If you must make changes, you should strengthen the CRA to address the proliferation of predatory lending in poor communities and communities of color. As individual citizens, small business owners and community organizations, we have little



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power alone to fight the mega mergers in banking. The mega mergers weaken the support base for community-based organizations and the citizens working hard every day with low wages and little benefits. These are the citizens in need of strong CRA regulations to keep loans fair, lending predators at bay, and support and training so financial literacy becomes the norm.

I am looking to you to keep the small bank definition at \$250 million in assets. That along with stronger predatory lending standards is a must for CRA regulations. Add to that, lower CRA grades for unfair loan practices, and you are on the right track to help the communities that need it the most.

Do not ease the CRA restrictions at a time when they need more teeth. Many communities are working hard to improve, but lowering the standards required will only make it more difficult to reach the American Dream. Thank you for taking the time to listen.

Sincerely,

Rob Howard, President
North San Diego County NAACP

cc:

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