

# SOUTHERN RESEARCH & DEVELOPMENT CORP.

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SR. HELEN VINTON  
PRESIDENT

March 25<sup>th</sup>, 2004

259

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

Dear Sir or Madam:

We are writing against the proposed change to rules governing the Community Reinvestment Act (CRA). In particular, we are opposed to changing the definition of a "small bank" from a bank with assets of 250 million dollars to a bank having assets of 500 million dollars. The proposed rule would adversely impact the rural communities in which we work by removing incentives for local, community banks to invest in the future prosperity and health of the communities that they serve.

Instead, we urge you to maintain the current "small bank" definition so that local, smaller banks are provided with the same incentives for community investment as larger banks. This is especially important for rural communities, since many larger national banks do not serve, and do not invest, in rural areas. In addition, we encourage federal bank and thrift agencies to institute a comprehensive predatory lending policy to protect the assets of all families, whether rural or urban. Banks should be provided with a disincentive to engage in predatory practices by insuring that abusive lending count against an institution's CRA rating.

Sincerely,

A handwritten signature in cursive script that reads "Helen Vinton".

Sister Helen Vinton  
President