

NATIONAL  
COMMUNITY  
REINVESTMENT  
COALITION

NCRC

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DISSEMINATION  
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December 1, 2000

Manager, Dissemination Branch  
Information Management and Services Division  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552  
Attention: Docket No. 2000-91

To Whom It May Concern:

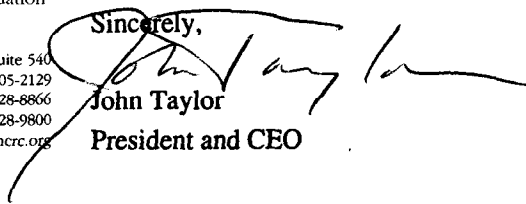
On behalf of the National Community Reinvestment Coalition and its 800 member organizations across the country, I am writing in response to the OTS' request for comment on its proposal to require certain savings and loan holding companies to notify the agency before engaging in new business activities, including the acquisition of new assets.

While NCRC applauds the OTS for its efforts to increase supervisory vigilance of holding companies to protect the safety, soundness, and stability of their banking affiliates, we are concerned that the OTS proposal fails to clearly define those assets that may trigger a notice requirement under the rule. The lack of a clear definition leaves open the possibility that thrifts may try to define other thrifts as assets, and thus avoid the usual merger application process. We are also concerned about the lack of any public comment period associated with the filing of these proposed notices. This is particularly worrisome, for instance, in cases where a holding company seeks to obtain ownership control of a non-depository subprime lender.

In the aforementioned case and others of a similar nature, NCRC believes that Community Reinvestment and fair lending factors should be explicitly considered when weighing whether to allow such asset acquisitions to go forward. In addition, the public should have the formal opportunity to provide the OTS with their analysis of how such an acquisition may effect their communities. With the disproportionate growth of subprime and predatory lending in underserved communities nationwide, it is only appropriate and in keeping with the intent of CRA and other fair lending laws that residents of these communities are given the right to voice their concerns about transactions that could have negative economic impacts on their neighborhoods.

We hope that our comments help inform your rulemaking process to ensure that the interests of the public, and underserved communities in particular, are fully and fairly represented.

Sincerely,

  
John Taylor  
President and CEO

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