



28

September 21, 2001

Sam Eskenazi
Office of Thrift Supervision
1700 G St NW
Washington, DC 20552
RE: CRA Proposed changes

Dear Mr. Eskenazi,

Affordable Housing Resources, Inc (AHR) is a 12 year old non-profit, housing development corporation in Nashville, TN. AHR has constructed and sold over 400 homes and assisted another 3,800 very low, low and moderate-income families buy homes with our education and lending programs. None of this would have been possible without the Community Reinvestment Act (CRA).

As such, Affordable Housing Resources and the thousands of low-income clients we have served, are strong supporters of the CRA. AHR proposes the following related to CRA pending revisions:

AHR feels strongly that the integrity of all three CRA tests: lending, investment and servicing, be maintained. AHR believes that one test will not provide enough incentive to banks to offer the different types of services, including loans, equity investments and banking services, which are needed in low-income communities.

In addition, AHR believes the agencies should resist broadening the definition to include more banking activities. Community development should stay with these measurements: affordable housing (including multifamily rental housing) for low or moderate income individuals; community services targeted to low or moderate income individuals; activities that promote economic development by financing small businesses and farms; and activities that revitalize or stabilize low-income or moderate income geographies.

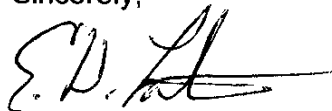
Finally, AHR believes that loans should be examined for predatory practices. AHR acknowledges the need for sub prime lending, but not lending with predatory rates meant to deplete equity in the community. Banks should not be

1011 CHERRY AVENUE
NASHVILLE, TENNESSEE 37203
PHONE 615-251-0025 FAX 615-256-9836

given credit for making predatory loans. Therefore, we support monitoring the quality of loans that qualify for CRA credit.

AHR is a strong supporter of CRA. Indeed, CRA has changed the way we do business. We want to assure that banks are serving low-income communities adequately, fairly and without charging them predatory rates.

Sincerely,

A handwritten signature in black ink, appearing to read 'E.D. Latimer', with a long horizontal flourish extending to the right.

E.D. Latimer
Executive Director