

From: amyperl@gis.net
Sent: Thursday, January 20, 2005 11:08 PM
To: Comments, Regs; ssiddiqi@ncrc.org
Subject: RIN 3064-AC50
Re: No. 2004-53 and 2004-54
Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street NW
Washington, DC 20552

Dear Sir or Madam:

As a socially responsible investor, and as someone working in the field of local economic development, I am a strong supporter of the Community Reinvestment Act. It has helped combat redlining by lending institutions and provided vitally needed capital to struggling communities. Your proposed changes to CRA regulation would seriously weaken the Act by allowing thrifts to obtain CRA credits by financing community development in affluent neighborhoods rather than lower-income neighborhoods, and deprive community organizations of the opportunity to express their concerns in required meetings when two thrifts merge. I urge you to withdraw these changes.

Your proposed changes would allow thrifts with more than \$1 billion in assets to pick and choose which community needs they will meet, and would allow large thrifts to eliminate or water down the investment and service tests currently required as part of their CRA exam. The result will be less investment and reduced banking services in lower-income communities.

Yours Sincerely,

Amy Perlmutter