

January 8, 2005

Office of Thrift Supervision Regulation Comments Chief Counsel's Office 1700 G Street, NW Washington DC 20552

Attention: No. 2004-53 & 2004-54

Dear Regulation Comments Officers,

We are a grassroots advocacy organization committed to ending hunger and abject poverty. We have reviewed the above-cited proposals and we find them unacceptable.

Continued tight regulation of Community Reinvestment Act provisions will ensure that moderate- and low-income areas receive lending, investment and banking services. The proposed changes are likely to reduce the level of services.

Large thrifts would be able to choose what community needs they want to provide. They could choose to cherry-pick what areas they could most profitably serve. They would be free of the current CRA compliance examinations.

The OTS proposal cuts the heart out of CRA. Please scrap these ill-conceived proposals.

If you have any questions, please call our Director of Domestic Campaigns Meredith Dodson at (202) 6783-7100 x116.

Sincerely

Barbara J. Wallace

Executive Director

cc: National Community Reinvestment Coalition