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January 21, 2005



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

Dear Chief Counsel:

RE: No. 2004-53 and No. 2004-54.


I am writing in opposition to the proposals by the federal and banking regulatory agencies to weaken CRA exams and regulations.

The City of Wilmington has a great concern about the quality of life for all its citizens. Low-income, minority, and working class communities are at the greatest risk. Our low- and moderate-income communities are under constant attack from the number of high cost payday lenders, check cashers, and predatory mortgage lenders.

Currently, CRA imposes an affirmative and continual obligation on banks and thrifts to meet the needs of the local communities in which they are chartered. Major studies, including those conducted by the United States Treasury Department, the Federal Reserve Board, and Harvard University, have found that CRA increases home mortgage lending, affordable checking accounts, and banking services to minority and working class individuals and families. I know that this program makes a difference for our citizens and our community. I strongly urge the decision-makers to resist the temptation to weaken CRA exams and regulations. CRA is indispensable in ensuring the importance of an "ownership society" where low- and moderate-income communities, like Wilmington, have access to loans, mortgages, investment, branches, and basis banking accounts.

The Community Reinvestment Act should be strengthened, not weakened, to continue its fight against discrimination and redlining against minority and working class people.

Yours truly,


James M. Baker
Mayor