

From: Jan Easterday [janeast@gubbandbarshay.com]  
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To: Comments, Regs  
Subject: No. 2004-53

Gubb & Barshay LLP opposes the proposed rule change to the Community Reinvestment Act (No. 2004-53). The proposal would allow large

savings and loans to opt out of complying with investment and banking services examinations under the CRA. These exams have been very useful in

encouraging investment in low income housing and services to low income people. The proposal would also allow thrifts in rural areas to serve any

income population, while the CRA was established to direct resources to low and moderate income communities. We strongly oppose the proposed changes.

Sincerely,

GUBB & BARSHAY LLP

50 California Street, Suite 3155

San Francisco, CA 94111

Tel.: 415-781-6600

Fax: 415-781-6967

ngubb@gubbandbarshay.com