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To: 'regs.comments@ots.treas.gov.'
Cc: Boyd, Angela
Subject: CRA requirements and docket numbers, No. 2004-53 & 54

I cannot think of a worse time to relax the requirements of Community Reinvestment Act (CRA) exams:

1. The requirements of this Act have been instrumental in building needed housing, sponsoring other crucial investments and providing services which are otherwise not provided by the market. Without the Act, they aren't provided.

2. To exempt institutions under \$1 billion significantly reduces those participating. Breadth of participation is a necessity, and this layer of banks is key.

3. Allowing large institutions to opt out of service or investment requirements (as opposed to lending) will allow important programs wither. As examples, branch banking services in low income areas are crucial resources for those communities, and investments in affordable housing projects are virtually the only way this critical need is being addressed. To allow major players to opt out means their interests, not the country's, will control. Without CRA, few lenders provided these programs. If its just up to them, why would they do so now ?

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