

From: Antonia Bullard [tanda@willex.com]
Sent: Thursday, January 20, 2005 5:28 PM
To: Comments, Regs
Cc: beam@vdcu.org.
Subject: 2004-53, 2004-54

As an award-winning low-income designated credit union that has invested \$140 million with thousands of Vermonters who are denied fair and affordable financial services by mainstream institutions, we are acutely aware that the existing system by no means provides equal access to banking and lending services.

We strongly oppose the OTS proposal to reduce any incentives for community reinvestment, such as giving CRA credit to thrift institutions for activities in rural areas with no measure of the benefit to low and moderate income people and places. We also consider it essential that large institutions remain accountable for investments and services as well as their lending.

Sincerely,

Caryl Stewart

President and CEO

Vermont Development Credit Union