INTEROFFICE MEMORANDUM

TO: OFFICE OF THRIFT SUPERVISION

FROM: WILLIAM E. HALE

SUBJECT: 2004-53, 2004-54

DATE: 03/02/2005

CC:

On behalf of Neighborhood Development Services, Inc., I would like to express our opposition to the OTS proposal. Essentially, what this proposal accomplishes would undermine the low and moderate income families that our organization serves. CRA credit should not be given for activities in rural and disaster areas if low and moderate income individuals are not going to benefit from it. Larger institutions must be held accountable for their investments and services, as well as their lending practices.

We respectfully request further consideration of the impact proposals such as the OTS proposal will have on our underserved populations. Thank you for your attention.

Sincerely,

NEIGHBORHOOD DEVELOPMENT SERVICES, INC.

William E. Hale, President