
From: Brenda Durham [bdurham@jcha.com]
Sent: Monday, January 24, 2005 4:28 PM
To: Comments, Regs
Subject: Please Preserve Community Investments (CRA)

Brenda Durham
3700 Industrial Parkway
Birmingham, AL 35217

January 24, 2005

CRA CRA

Dear CRA CRA:

A series of regulatory proposals could dismantle the Community Reinvestment Act, which requires banks to lend, invest, and provide services in low-income communities.

The latest challenge comes from the Office of Thrift Supervision, one of four federal agencies that share CRA oversight. OTS is considering relieving the institutions they oversee of any further investment and service requirements under CRA. We expect many banks to weigh in favor of this relief. Ending CRA requirements for investments and services under CRA would undermine billions of dollars annually of investments in low-income housing, small businesses, economic development, and historic rehabilitation, as well as such consumer services as convenient bank branches and basic banking accounts. The regulators will be watching closely to see if community and consumer organizations object. It would be easy to miss the OTS inquiry, since it is raised only in the "preamble" discussion to an ill-advised proposal to give CRA credit to thrifts for rural community development activities that do not benefit low-income people or places.

All federally insured financial institutions should continue to be fully accountable under CRA for making investments and providing services. I also oppose the OTS proposal to consider favorably rural community development activities that do not primarily benefit low-income people or communities.

Sincerely,

Brenda Durham