From: wdrougle@ucdavis.edu

Sent: Thursday, January 20, 2005 10:43 PM

To: Comments, Regs; ssiddiqi@ncrc.org

Subject: RIN 3064-AC50 Re: No. 2004-53 and 2004-54

Regulation Comments Chief Counsel's Office Office of Thrift Supervision 1700 G Street NW Washington, DC 20552

Dear Sir or Madam:

So far, the Community Reinvestment Act has fared pretty well in its mission to combat redlining. Because of the CRA, many struggling community projects have benefitted from loans they otherwise never would have seen. But we still have a long way to go, and the most recently proposed changes are counterproductive to say the least.

I urge you to withdraw your proposed changes to the CRA regulations. The Act will be seriously weakened if thrifts can obtain CRA credits just by financing community development in affluent neighborhoods rather than lower-income neighborhoods, and depriving community organizations of the opportunity to express their concerns in required meetings when two thrifts merge.

Your proposed changes would allow thrifts with more than \$1 billion in assets to pick and choose which community needs they will meet. I'm sure they will choose to fund projects in affluent rather than low-income neighborhoods. The result will be less investment and reduced banking services in lower-income communities. Please help by withdrawing the proposed changes!

Yours Sincerely,

Wolfgang Rougle