

From: Heidi Siegfried [hsiegfried@pfth.org]  
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The Community Reinvestment Act is a critical component to our community's affordable housing and community development solutions. We oppose any changes that would allow thrifts to cease providing investments and services. The withdrawal of banking services from low income neighborhoods increases the likelihood that they will be subjected to predatory lenders.

As an attorney who served low income people in a rural area of NY for over 10 years, I am also concerned about the proposal to count all investment, loans, and services in rural areas towards CRA responsibilities regardless of whether they benefits low income people.

We urge the OTS to withdraw its proposed rule.

Heidi Siegfried, Esq.

Supervising Attorney

Partnership for the Homeless

305 Seventh Avenue, 13th Floor

New York, NY 10001-6008

(212) 645-3444 ext. 130

hsiegfried@pfth.org