

Date: January 24,2005

To: Office of Thrift Supervision

Subject: 2004-53, 2004-54 CRA

From: Jeanne Robinson
South Central Community Action

South Central Community Action Program strongly oppose the OTS proposal to give CRA credit to thrift institutions for activities in rural and disaster areas with no benefit for low and moderate income people and places. It is also essential that large institutions remain accountable for investments and services as well as their lending.

Thank you for your concern.