

From: Leo Quigley [lquigley@ix.netcom.com]
Sent: Monday, January 24, 2005 11:46 AM
To: Comments, Regs
Subject: 2004-53 Community Reinvestment Act

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

Attention: No. 2004-53 & 2004-54

To Whom it May Concern:

We are concerned that regulatory changes under consideration, relieving the institutions overseen by the Office of Thrift Supervision (OTS) of any further investment and service requirements under the Community Reinvestment Act (CRA), would result in reduced community development financing and basic banking services in low- and moderate-income communities. Allowing thrift institutions to design their own CRA exams, rather than meet the more rigorous standards of existing regulations, would enable thrifts to reduce their efforts to meet important community obligations. All federally insured financial institutions should continue to be fully accountable under CRA for making investments and providing services.

We also oppose the OTS proposal to consider favorably rural community development activities that do not primarily benefit low-income people or communities. Community development activities in more affluent rural areas do not serve the primary purpose of CRA.

Finally, we oppose regulations that would reduce opportunities for community groups and citizens to meet with thrifts and the OTS to discuss CRA and predatory lending issues when thrifts are merging. These conversations, while sometimes contentious, lead to constructive dialogue that results in important gains for low- and moderate-income communities.

Sincerely,

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