From: Housing Association of Delaware Valley [info@hadv.org]

Sent: Tuesday, December 14, 2004 10:24 AM

To: Comments, Regs Subject: No. 2004-53

The Housing Association of Delaware Valley opposes the proposed rule change to

Community Reinvestment Act (No. 2004-53). The proposal would allow large savings and loans to opt out of complying with investment and banking services examinations under the CRA. These exams have been very useful in encouraging investment in low income housing and services to low income people. The proposal would also allow thrifts in rural areas to serve any income population, while the CRA was established to direct resources to low and moderate income communities. We strongly oppose the proposed changes.

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