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January 24, 2005

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James E. Gilleran
Director
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

Attention: No. 2004-53 & 2004-54

Dear Director Gilleran:

Please allow this letter to serve as the formal statement of opposition to the proposed rules changes to the Community Reinvestment Act proposed by your office. The undersigned members of the New York State Assembly are joining with the hundreds of other concerned Americans that have asked your office to withdraw the proposals listed above.

The reasons for our objections are clear and we believe are in the best interest of low- and moderate-income communities across the State of New York. Of utmost importance is our belief that your proposals will result in considerably less community development financing and basic banking services to hundreds of communities across New York.

We are considerably troubled by the Office of Thrift Supervision's plan to allow thrift institutions to design their own watered-down Community Reinvestment Act (CRA) exams. We are concerned that thrifts will eliminate the investment and service parts of the CRA exam, meaning that you would not require them to make investments in or provide branches to low-and moderate-income communities.

At stake is the loss of a community-building tool that has helped improve the lives of millions of New Yorkers in low- and moderate-income communities. Without a strong CRA, we will see depressed communities across New York, suffering an exodus of traditional banks and an explosion of predatory mortgage lenders and abusive payday lenders filling the void left by the banks.

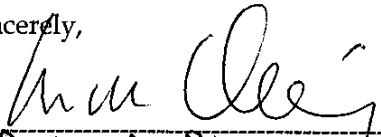
Your proposal threatens to eliminate the investment and service tests presently required by CRA and would reduce the level of community development financing because these tests hold banks accountable for making critical investments and services available in low- and moderate-income communities.

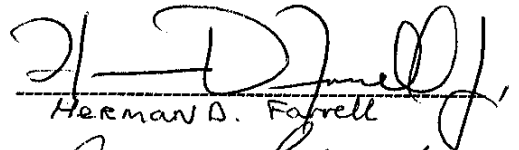
The investment test requires banks to make investments in affordable housing via instruments like Low-Income Housing Tax Credits, in sewer and infrastructure projects via state or municipal bond issues, and in community facilities like child care centers and health clinics. In New York City alone, 24,146 apartments were funded by Low Income Housing Tax Credits.


The service test requires banks to build and maintain branches in low- and moderate-income communities and to offer affordable banking services like deposit accounts and remittances.


We strongly urge you to withdraw your proposal. It is an ill-conceived policy shift that will create economic havoc on low- and moderate-income communities across New York State.


Sincerely,

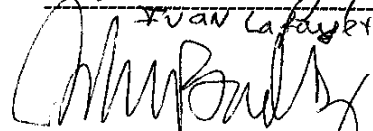

Peter M. Rivera

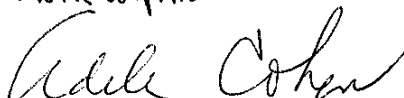

Herman D. Farrell

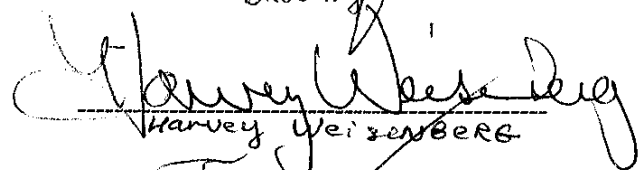

Philip Ramos



Ivan Lafayette



Mark Weprin

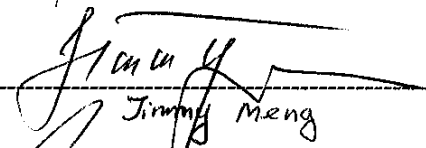

Richard Brodsky

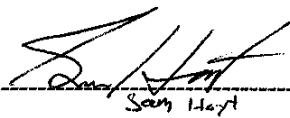

Adele Cohen



Harvey Weisenberg



Daryll Towns

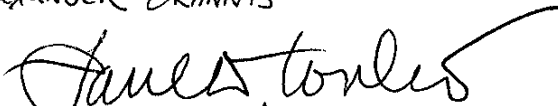

Felix Ortiz

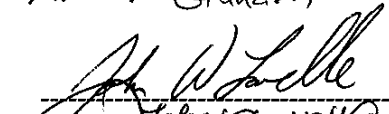

Jimmy Meng


Sam Hoyt



ALEXANDER GRANNIS

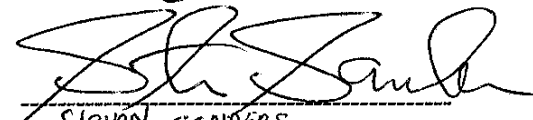

Michael Grannis

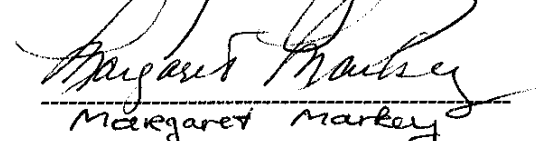

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CARMEN ARROYO

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RUBEN DIAZ, JR

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JAMES BRENNAN

Jose Rivera

JOSE RIVERA

Naomi Rivera

NAOMI RIVERA

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LUIS DIAZ

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MICHAEL BENEDETTO

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WILLIAM BOYLAND JR

Kenneth D. Zebrowski

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Jose Peralta

Charles R. Golef

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Carl Heastie

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AUDREY PHEFFER

Diane Gordon

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Adam Clayton Powell

ADAM CLAYTON POWELL

William Scarborough

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Brian McCullough

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Michael Benjamin

MICHAEL BENJAMIN

Frank R. Seddio

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Wettie Mayersohn


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Jean Millman


JEAN MILLMAN

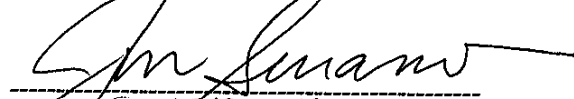
Peter Abbate

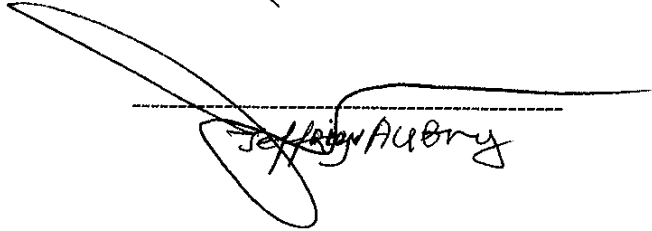
PETER ABBATE

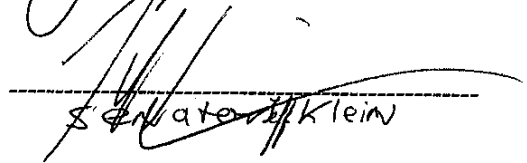

SEN. Martin DILAN


SENATOR Efraim GONZALEZ


SENATOR RUBEN DIAZ


SENATOR JOSE SERRANO


SENATOR Auer


SENATOR Klein

CC: All Task Force Member
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New York Congressional Delegation

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Honorable Herman D. Farrell Jr.
Honorable Philip Ramos
Honorable Ivan Lafayette
Honorable Mark Weprin
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Senator Ruben Diaz

Senator Jose Serrano

Senator Jeffrey Klein