

From: mhx2525@fastmail.fm
Sent: Sunday, January 23, 2005 9:54 PM
To: Comments, Regs; ssiddiqi@ncrc.org
Subject: RIN 3064-AC50
Re: No. 2004-53 and 2004-54
Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street NW
Washington, DC 20552

Dear Sir or Madam:

As a socially responsible investor, I am a strong supporter of the Community Reinvestment Act, which has helped combat redlining by lending institutions and provided vitally needed capital to struggling communities.

I urge you to withdraw your proposed changes to CRA regulations, which would seriously weaken the Act by allowing thrifts to obtain CRA credits by financing community development in affluent neighborhoods rather than lower-income neighborhoods, and depriving community organizations of the opportunity to express their concerns in required meetings when two thrifts merge. It seems to me that this proposed rule change will gut the essence of the CRA, by making it legal for the larger thrifts to, basically, spend their "community investments" wherever they want. By removing the requirement for thrifts to meet with community organizations before merging, the change will eliminate any recourse by the community to address issues of poor service or concerns about the impacts of a merger.

Your proposed changes would allow thrifts with more than \$1 billion in assets to pick and choose which community needs they will meet, and would allow large thrifts to eliminate or water down the investment and service tests currently required as part of their CRA exam. The result will be less investment and reduced banking services in lower-income communities.

I feel strongly that these proposed rule changes violate the spirit of the CRA and are intended to serve the large thrift institutions, NOT the affected communities. Please withdraw this proposed change and keep CRA as an effective tool for communities to have some say in their future.

Yours Sincerely,

Margaret HilsbosMargaret Hilsbos