

From: Robert Guarasci [rguarasci@njcdc.org]
Sent: Wednesday, January 19, 2005 5:50 PM
To: Comments, Regs
Subject: Comment No. 2004-53 & 2004-54

Office of Thrift Supervision

Re: No. 2004-53 & 2004-54

To Whom It May Concern:

The Office of Thrift Supervision's proposed changes to the Community Reinvestment Act are unconscionable and would result in considerably fewer community development financing and basic banking services in low- and moderate-income communities. You would allow thrift institutions to design their own watered-down Community Reinvestment Act exams. It is incredible that you would even consider such a thing. The thrifts could 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 the same time, your proposal would allow thrifts to finance community development of affluent communities, not lower-income neighborhoods, in rural areas and areas afflicted by natural disasters. This is contrary to the purpose of CRA to combat redlining of low- and moderate-income communities. You also propose to reduce opportunities for community groups and citizens to meet with thrifts and your agency to discuss CRA and anti-predatory lending issues when thrifts are merging.

Please withdraw your proposal. It is so ill-conceived that you are the only agency out of four banking agencies proposing it and makes one wonder if OTS has any concern at all for low-income individuals and communities. If you have any questions, please call me at 973-413-1632.

Thank you for your consideration.

Sincerely,

Robert Guarasci

President

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