
From: Pietravoia, Frank [FPietravoia@ci.euclid.oh.us]
Sent: Monday, January 24, 2005 6:21 PM
To: Comments, Regs
Cc: ssididiq@ncrc.org
Subject: 2004-53 Community Reinvestment Act

For more than 25 years, the federal CRA laws have helped communities like the City of Euclid, Ohio, a first ring suburb of Cleveland, to get the bank loans and services they need to rebuild their neighborhoods. The effectiveness of the CRA law is being threatened by the proposals from the federal Office of Thrift Supervision.

The existing CRA law which encourages banks to serve low-income communities in their markets has resulted in increased homeownership and small-business growth, helping to revitalize communities such as Euclid, Ohio. It is my understanding from reviewing materials on the internet discussing the OTS proposal, that since its inception, the present CRA law has prompted banks to channel more than \$1 trillion into reinvestment projects - without requiring any Congressional spending. Clearly at this level of investment, the capital made available under the CRA act has helped to rebuild entire communities.

Therefore, as Development Director for the third largest community in Cuyahoga County, Ohio, I am writing to voice my opposition to the OTS proposal and to recommend that all federally insured financial institutions should continue to be fully accountable under CRA for making investments and providing services. I feel that the OTS proposal will lead to fewer investments, basic banking services, and branches in low- and moderate-income neighborhoods of communities such as Euclid, Ohio. The OTS' proposal removes CRA's focus of meeting the credit needs of low- and moderate-income communities. If the Office of Thrift Supervision (OTS) adopts this proposal, the agency will effectively remove the service to low- and moderate-income communities that banks and thrifts have had an obligation to provide under the current CRA law.

I urge you to reconsider and withdraw this proposal. Thank you for the opportunity to comment.

Frank Pietravoia, Director
City of Euclid
Department of Community Services & Economic Development
585 East 222nd Street
Euclid, OH 44123-2099
216 289-8160
fpietravoia@ci.euclid.oh.us