MEMO

DATE: January 10, 2005

TO: Office of Thrift Supervision

FROM: Kelly Feeney, Housing & Energy Director;

Northwestern Ohio Community Action Commission

RE: 2004-53, 2004-54

I strongly oppose the OTS proposal to give CRA credit to thrift institutions for activities in rural and disaster areas with no benefit for low and moderate income people and places. It is also essential that large institutions remain accountable for investments and services as well as their lending. Thank you for your time and attention.