

January 24, 2005

Filed via email to regs.comments@ots.treas.gov

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW,
Washington, DC 20552

Re: No. 2004-53; 12 CFR Part 563e; Community Reinvestment Act - Community Development, Assigned Ratings; 69 Federal Register 68257; November 24, 2004

Dear Sir or Madam:

I am writing on behalf of the Nevada Bankers Association (NBA) in response to the Office of Thrift Supervision (OTS) proposal of two significant changes to the OTS regulations implementing the Community Reinvestment Act (CRA) as noticed in the Federal Register.

Of particular interest to members of the NBA is the proposal to amend the definition of "community development" to encourage more community development activities by large savings associations in non-metropolitan areas and in areas subject to natural and other disasters and other community-wide disruptions. Much of Nevada would be classified as non-metropolitan and the financial institutions serving those areas would benefit greatly from this change. Further, recent floods devastated rural communities in southern Nevada, some of which ironically lie in a metropolitan county. While the proposed change in the regulation may be too late to benefit these communities, it would serve such communities well if similar tragedies occurred in the future.

The NBA also supports allowing large institutions to change the weight of the lending, service and investment tests in the assignment of CRA ratings. The American Bankers Association has submitted comments on this proposal and the Nevada Bankers Association fully supports those comments.

Thank you for your attention to this important matter.

Sincerely,

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