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**From:** Reid Robbins [reidr@shad.org]  
**Sent:** Monday, January 24, 2005 9:09 AM  
**To:** Comments, Regs  
**Cc:** jsilver@ncrc.org; Eloar@city.cleveland.oh.us  
**Subject:** Proposed Changes to CRA by OTS

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

Attention: No. 2004-53 & 2004-54  
To Whom it May Concern:

OTS's proposal to change CRA requirements will result in considerably less 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 (CRA) exams. 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 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 ill-conceived, as evidenced by the fact that OTS is the only agency of the 4 regulatory agencies that is proposing it. You can call me at 216.421.2100 should you desire to further discuss this matter.

Sincerely,

Reid Robbins, Exec. Dir.  
Shaker Square Area Development Corp.  
Cleveland, Ohio

cc. National Community Reinvestment Coalition