

From: Kay Bowers [kbowers@blounthabitat.org]
Sent: Wednesday, January 12, 2005 11:46 AM
To: Comments, Regs
Subject: attn: re: No.20044-53 & 2004-54

Regulation Comments

Chief Counsel's Office

Office of Thrift Supervision

Washington DC 20552

Attention: No. 2004-54 & 2004-54

To Whom it May Concern:

Your proposal 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 Community Reinvestment Act (CRA) exams. This is a blatant example of the "fox designing the hen house". 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 communities in rural areas and areas affected by natural disasters. These proposed changes are contrary to the CRA's original intended purpose which was 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. Our community already receives very little benefit from CRA and these proposed changes will only create more opportunity for predatory lending in our communities by encouraging the responsible lenders to move to more affluent areas.

Please withdraw your proposal. It will have a negative impact within the United States as a whole by limiting the financial options in communities which need it the most. In the state of Tennessee we have seen the terrible instability that comes to a community and stays as long as this practice exists.

Sincerely,

Kay Bowers, Executive Director

Blount County Habitat for Humanity

245 Lindsay Street

Alcoa, TN. 37701