From: Arnold Cohen [acohen@hcdnnj.org] Sent: Tuesday, January 11, 2005 3:47 PM

To: Comments, Regs

Subject: No. 2004-53 & 2004-54

January 11, 2005

To Whom it May Concern:

This "Office of Thrift Supervision" (OTS) proposal will result in considerably less community development financing and basic banking services in low- and moderate-income communities. It 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 it would not require them to make investments in or provide branches to low-and moderate-income communities. At the same time, the proposal would allow thrifts to finance community development of affluent communities, not lower income neighborhoods, 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. The proposal would also reduce opportunities for community groups and citizens to meet with thrifts and the OTS to discuss CRA and anti-predatory lending issues when thrifts are merging.

Please withdraw this proposal. It is step backword in meeting the banking needs of low- and moderate-income communities.

Arnold Cohen

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