



U-SNAP-BAC Inc.
U-SNAP-BAC Non-Profit Housing Corporation

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January 11, 2005

Linda Smith
 Executive Director

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

Dr. Anthony Shipley
 Chairperson
 (Christ United Methodist Church)

Attention: No. 2004-53 & 2004-54

Richard Cunningham
 Vice-Chairperson
 (PLUS)

Dear Officers of OTS:

Mary Finch
 Secretary
 (CBC)

I, (We) at U-SNAP-BAC strongly urge you to withdraw your proposal to make changes to the Community Reinvestment Act. The proposed changes are contrary to the purpose of CRA to combat redlining in minority and low-income communities.

Michael Cheatham
 Treasurer
 (Comerica Bank)

Our concern is that the proposal will result in considerably less community development financing and the provision of needed banking services in low-and moderate-income neighborhoods. This would allow thrifts to create their own definition of CRA obligations, and not take into consideration the needs of the community within their market. The proposal could open the door to the elimination of the investment and service tests.

William Gracey
 (NU)

Further, the proposed changes could close the door to requiring thrifts to provide branch offices to minority and low-income communities. Lastly, it will reduce opportunities for community groups and concerned citizens to meet with thrifts and the OTS to discuss CRA and anti-predatory lending issues when mergers or acquisitions are sought.

Annette Jones-Daniels
 (CBC)

In essence, your proposal will turn back the hands of time in the advancement of economic justice and re-create the days of financial inequality within the banking industry.

PLEASE WITHDRAW YOUR PROPOSAL NOW!!!

Sincerely,

Linda Smith
 Executive Director

Beverly Kindle-Walker
 (Neighborhood City Hall)

Carole Wiseman
 (CCEBA)

Doug Shahady
 (CCEBA)

LeRoy Mattic
 (CPNA)

Lillian Williams
 (CPNA)

Marjorie Henry
 (PLUS)

Maxine Jones
 (GREAT)

Rebecca Brown-Slay
 (United Way)

Robert W. Mason
 (MorningSide)

Yemi Adebisi
 (Comerica Bank)