

From: devrainma@yahoo.com
Sent: Sunday, January 23, 2005 3:17 PM
To: Comments, Regs; ssiddiqi@ncrc.org
Subject: RIN 3064-AC50
Re: No. 2004-53 and 2004-54
Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street NW
Washington, DC 20552

Dear Sir or Madam:

As a socially responsible investor, as well as the Executive Director of the Haight Ashbury Food Program (HAFP), an organization that supports freedom from hunger and ending poverty and homelessness within our community, I am a strong supporter of the Community Reinvestment Act. This Act has helped combat redlining by lending institutions and provided vitally needed capital to struggling communities, including the homeless and extremely low-income populations served by HAFP.

I urge you to withdraw your proposed changes to CRA regulations, which would seriously weaken the Act by allowing thrifts to obtain CRA credits by financing community development in affluent neighborhoods rather than lower-income neighborhoods, and depriving community organizations of the opportunity to express their concerns in required meetings when two thrifts merge.

Your proposed changes would allow thrifts with more than \$1 billion in assets to pick and choose which community needs they will meet, and would allow large thrifts to eliminate or water down the investment and service tests currently required as part of their CRA exam. The result will be less investment and reduced banking services in lower-income communities.

Yours Sincerely,

Devra M. Edelman