

From: mole333@gmail.com  
Sent: Sunday, January 23, 2005 10:02 AM  
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

I have been a socially responsible investor for nearly 20 years. As such, I am a strong supporter of the Community Reinvestment Act, which has helped combat redlining by lending institutions and provided vitally needed capital to struggling communities. I have been part of the community reinvestment movement both in Chicago (South Shore Bank) and New York City (Community Capital Bank). This system works well and should not be messed with.

I strongly oppose your proposed changes to CRA regulations. Your changes would weaken the Act by allowing thrifts to obtain CRA credits by financing community development in affluent neighborhoods rather than lower-income neighborhoods. Doesn't that defeat the entire purpose of the Act? It isn't as if the affluent neighborhoods need the investments more than the lower-income neighborhoods do.

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,

David Michaelson