From: Mark Laubacher [mark@laubacherco.com] Sent: Monday, December 20, 2004 2:57 PM

To: Comments, Regs

Subject: 2004-53 Community Reinvestment Act

I understand that OTS is expected to initate discussions on lessening CRA

requirements for thrifts. I am opposed to such action.

Financial institutions are free to do without federal deposit insurance if they wish. Indeed, most assets in our economy are invested without the benefit of federal deposit insurance. However, if institutions want to operate with the benefit of federal deposit insurance, in my opinion, the "greater good" must be served other than the institution being operated for the benefit of shareholders.

CRA investments have benefited thousands of worthy developments and investments. The requirement to examine a "double-bottom line" has made financial institutions seek out areas where they might otherwise would have not found loan opportunities. No one has ever forced a federally insured institution to make a "bad investment" due to CRA – there are deals out there, they just need to be found.

Please do not consider any dilution of current OTS standards for CRA investment and loan requirements.

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