

**From:** Mary Banks [banksndnd@ameritech.net]  
**Sent:** Monday, January 24, 2005 12:38 PM  
**To:** Comments, Regs  
**Subject:** 2004-53  
**Importance:** High



## Building on Faith ... Building a Community

January 21, 2005

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

**Attn.: No. 2004-53 & 2004-54**

Dear Officers of OTS:

I am writing to you today to add my voice to the many you've been hearing from in opposition of the changes you are proposing to the Community Reinvestment Act.

Northwest Detroit Neighborhood Development (NDND) is proud to be among the non-profit community development corporations in Detroit working to revitalize our city's neighborhoods. **To date, NDND has 198 new homes in Detroit's Brightmoor area and renovated more than 30 others.** Safe, well-built, attractive, affordable housing is integral to the revitalization of Detroit; but organizations such as NDND need your support — and the proposed changes are contrary to the purpose of CRA to combat redlining in minority low-income communities.

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 them to create their own definition of CRA obligations, and not take into consideration the needs of the community within their market. **All federally insured financial institutions should continue to be fully accountable under CRA for making investments and providing services. I also oppose the OTS proposal to consider favorably rural community development activities that do not primarily benefit low-income people or communities.** The proposal could open the door to the elimination of the investment and service tests. The changes could also close the door to requiring thrifts to provide branch offices in minority and income communities. Clearly, it will reduce opportunities for community groups and concerned citizens to work with thrifts

3/11/2005

Please withdraw your proposal to amend the Community Reinvestment Act.

Sincerely,

John O'Brien  
Executive Director

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