STEPHANIE TUBBS JONES
11ST DISTRICT, OHIO

Congress of the United States
House of Representatives
Washington, DC 20515-3511

January 24, 2005

The Honorable James E. Gilleran
Director
Office of Thrift Supervision
1700 G Street, NW
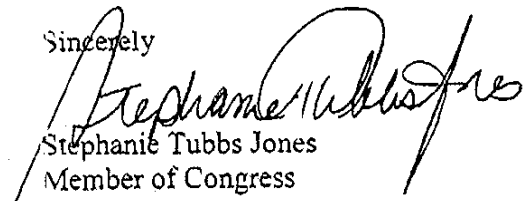Washington, DC 20552

RE: No. 2004-53

I am writing to urge you to withdraw Proposal No. 2004-53, which would redefine community development activity for the purpose of regulating the Community Reinvestment Act (CRA). I, along with 52 Community Development Corporations in my district, believe that this proposal will detract from the services that traditionally have assisted the low and moderate income and urban areas.

This proposal would expand the definition of a community development activity to include activities that benefit any individual who resides in rural areas, therefore shifting the focus of community development activities from activities that benefit the communities of low to moderate income individuals to activities that benefit individuals of higher income levels. This proposal would also give financial institutions the authority to choose whether to fund activities of the low and moderate income and urban areas or affluent communities in rural areas. The financial institution, in either instance, would gain favorable CRA ratings because they provided services in rural locations.

In addition, changes to this proposal would grant large financial institutions total discretion over which communities to invest in, instead of investing in the community in which they are located. This will have a significant negative affect on the merit of CRA, and would result in financial institutions having no liability to the communities in which they are located. Furthermore, this would result in the neglect of the communities that have traditionally benefited most from these investments.

Thank you for your attention to this matter. It is my hope that the Community Reinvestment Act will continue to serve the needs of the communities for which it was created.

Sincerely

Stephanie Tubbs Jones
Member of Congress

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