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Sent: Thursday, December 30, 2004 2:20 PM
To: Comments, Regs
Subject: 2004-53 Community Reinvestment Act

Common Ground Community, a not-for-profit housing and community development organization in New York City, opposes the proposal by OTS to change CRA regulations. CRA has been an invaluable tool to increase small business development, homeownership, and affordable rental housing in low- and moderate-income communities. Thrifts must continue to be accountable under CRA for investments and services in these communities. Changes in this program will impede the substantial economic progress that CRA has afforded communities across the country.

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