

From: Connie Michelle Galambos [connieg@uclink.berkeley.edu]  
Sent: Monday, January 17, 2005 3:04 PM  
To: Comments, Regs  
Cc: cnycitizenaction@aol.com  
Subject: 2004-53, 2004-54

Attention: No. 2004-53 & 2004-54  
To Whom it May Concern:

I am writing to express my anger at the above proposal, which will inevitably lead to less banking services in low income communities. The proposal means that there will be less community development financing in general, and in an era when large budget cuts to HUD programs are on the horizon, we must take care to safeguard shrinking resources. Perhaps most alarming is the idea that thrift institutions would be able to design their own versions of Community Reinvestment Act (CRA) exams. That opens the door for thrifts eliminating the investment and service parts of the CRA exam, exempting them from making investments in or providing branches to low-and moderate-income communities.

The proposal allows thrifts to finance community development of affluent communities, not lower income neighborhoods, in rural areas and areas afflicted by natural disasters. I understand this to be contrary to the purpose of CRA, which exists to combat redlining of low- and moderate-income communities. Reducing opportunities for community groups and citizens to meet with thrifts and your agency to discuss CRA and anti-predatory lending issues when thrifts are merging compounds the relaxing and reversing of CRA's role in ensuring access to financial services and opportunities for less than affluent communities.

I insist that this proposal be withdrawn immediately - the fact that you are one agency out of four banking agencies proposing it should tell you something about the lack of support it will face going forward.

Please feel free to contact me at 510.717.3775 if there are any questions regarding my concerns.

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