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From: Ken Ford [kbford@tcinternet.net]
Sent: Monday, December 20, 2004 9:16 PM
To: Comments, Regs
Subject: 2004-53 Community Reinvestment Act

The accountability that thrift institutions have under CRA has been, and remains, vital for the progress our cities are able to make with some degree of balance in where the benefit falls. We have long experience with the undue burden that disinvestment so easily places on some sectors without this kind of oversight. Thrifts should continue to be fully accountable under CRA. I oppose allowing rural community investment to pass under the guidelines regardless of benefit to low income households as the OTS proposes.

Kenneth Ford
Planning Administrator for the City of Saint Paul, retired.