

*Warren W. Ayres
314 Midland Ave.
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January 19, 2005

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW.
Washington, DC 20552
Attention: No. 2004-53

Re: Community Reinvestment Act

Ladies and Gentlemen:

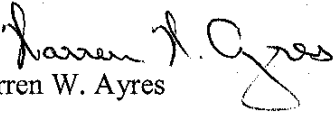
I belong to a committee of the Episcopal Diocese of Pennsylvania which has been active for many years in promoting community investment through The Reinvestment Fund ("TRF"), a "community development financial institution" that is based in Philadelphia, Pennsylvania. I am also a member of one of the parishes which invests in TRF, and I have also made a personal investment in TRF. I am writing to urge you to withdraw immediately your proposed changes to the Community Reinvestment Act ("CRA") regulations.

I understand that the effect of these regulations would be to create a watered-down, ineffective CRA exam for the nation's savings associations, in direct opposition of Congressional intent of the law. Under current regulations, large thrifts with assets of more than \$1 billion have performance evaluations that review lending, investing, and services to low- and moderate-income communities. You propose that all thrifts follow a community development criterion that allows them to eliminate the investment and service tests. Instead of demonstrating a full range of services to their communities, thrifts would be able to select their own examination criteria, without regard for the demand in their markets. This change would significantly reduce the amount of community development financing and services in low-income communities--the communities that the CRA was enacted to serve.

I do not want to see thrifts doing less to serve their communities and be able to avoid opportunities to provide financing for affordable housing, community services, and small businesses, as well as services for low-income people.

The CRA encourages federally insured financial institutions to meet the credit and banking needs of the communities they serve, especially low- and moderate-income communities. This proposal undermines the intent of CRA, and threatens to undo the years of effort to bring "unbanked" consumers into the financial mainstream. I urge you to remove immediately this dangerous proposal from consideration.

Yours very truly,


Warren W. Ayres

cc: Senator Arlen Specter
Senator Rick Santorum