



CENTRAL DETROIT CHRISTIAN
Community Development Corporation
www.detcdc.org

Regulations Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G. St., NW
Washington DC 20552

Attention: No.2004-53 & 2004-54

Dear Officers of OTS:

We at **Central Detroit Christian** strongly urge you to withdraw your proposal to make changes to the Community Reinvestment Act. The proposed changes are contrary to the purpose of CRA to combat reclining in minority and low-income communities.

Our concern is that the proposal will result in considerably less community development financing and the provision of needed banking services in low-and moderate-income neighborhoods. This would allow thrifts to create their own definition of CRA obligations, and not take into consideration the needs of the community within their market. The proposal could open the door to the elimination of the investment and service tests.

Further, the proposed changes could close the door to requiring thrifts to provide branch offices to minority and low-income communities. Lastly, it will reduce opportunities for community groups and concerned citizens to meet with thrifts and the OTS to discuss CRA and anti-predatory lending issues when mergers or acquisitions are sought.

In essence, your proposal **will turn back the hands of time in the advancement of economic justice and re-create the days of financial inequality** within the banking industry.

PLEASE WITHDRAW YOUR PROPOSAL NOW!!

Sincerely,

Lisa E. Johanon

cc.Detroit Alliance for Fair Banking
313.871.9055(FAX)