



OHIO CAPITAL
CORPORATION
FOR HOUSING

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Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
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Washington DC 20552
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regs.comments@ots.treas.gov

RE: No. 2004-53 & 2004-54

To Whom It May Concern:

The Community Reinvestment Act is a crucial element to our community's affordable housing and economic development efforts. We strongly oppose any change to the program that results in an investment reduction to community development and the provision of basic banking services in low- and moderate-income communities.

The proposed changes to the Community Reinvestment Act would eliminate the investment and service portion of the CRA exam, allowing thrifts the opportunity to neglect investments in low- and moderate-income communities. Concurrently, the proposal permits thrifts to invest community development dollars in affluent communities, not in those areas afflicted by natural disasters, in rural areas, or in lower income neighborhoods.

These changes sharply contrast the essence of the Community Reinvestment Act, to remedy years of redlining low- and moderate-income communities. Do not abandon the commitment to serve low- and moderate-income communities. And, do not minimize the public input process for discussing Community Reinvestment Act and anti-predatory lending issues when thrifts merge.

At the 2005 U.S. Conference of Mayors held last week, the Ohio Capital Corporation for Housing was recognized for our efforts to preserve and revitalize a significant affordable housing portfolio in Columbus, Ohio. This work is made possible through the investment of local lending institutions. The Community Reinvestment Act is essential to the continued investment in communities with the most need for basic services, as well as decent, safe and sanitary housing opportunities.

Please withdraw your proposal.

Sincerely,

Harold Keller
President

Jan. 24th, 2005