2004-53, 2004-54From: June Holley [juneh@acenetworks.org]

Sent: Monday, January 10, 2005 7:23 AM

To: Comments, Regs

Subject: 2004-53, 2004-54

As a CDFI working to increase small businesses' access to capital in a region where banks make business loans less than \$100,000 at rates 2 to 3 times LESS than the national average(www.ffiec.gov, ACEnet Ventures strongly opposes the OTS proposal to give CRA credit to thrift institutions for activities in rural and disaster areas with no benefit for low and moderate income people and places. It is also essential that large institutions remain accountable for investments and services as well as their lending. Thank you for your time and attention.

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