



**DELAWARE**  
**COMMUNITY INVESTMENT CORPORATION**

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September 14, 2007

Office of the Comptroller of the Currency  
250 E Street, SW, Mail Stop 1-5  
Washington, DC 20219  
Docket ID OCC-2007-0012

Mr. Robert E. Feldman, Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Ms. Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551  
Docket No. OP-1290

Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552  
ID OTS-2007-0030

RE: Community Reinvestment Act; Interagency Questions and Answers Regarding Community Reinvestment;  
Notice: OCC-2007; OP-1290; RIN 3064-AC97; and OTS-2007-0030.

Ladies and Gentlemen:

The Delaware Community Investment Corporation (DCIC) is a nonprofit multibank community development corporation which has a membership consisting of 40 commercial banks and thrifts. The Corporation serves the entire state of Delaware by offering financing for multi-family affordable housing and for community development projects such as daycare centers, medical centers, group homes, nursing home facilities, charter schools, and other such facilities. Since inception in 1994, DCIC has provided over \$343 million in debt and investment for the development or preservation of affordable housing units and community development activities.

Our member banks commit funds to our lending and investment programs and the funds are used to provide financing for developments throughout the state. The existence of DCIC, through the support of our member banks, has made a decided difference for low to moderate income people and areas in Delaware.

The discounting of CRA credit for broader participation in a lending consortia will negatively impact consortia across the nation. The critical role consortia play in providing affordable housing would be threatened due to lack of capital from participating members.

We are highly supportive of the current CRA guidelines on investments in broad geographic lending and investment funds, which basically states that an institution participating in such funds will receive CRA consideration for a loan and/or investment if the organization covers an area that is larger than, but includes the institution's assessment area.

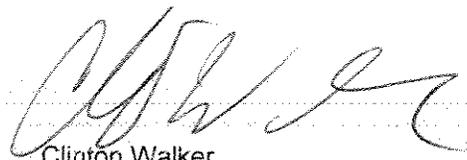
DCIC therefore strongly recommends that an institution should continue to receive full CRA Credit for its investment in statewide and regional funds that are formed and exist for the purpose of community development and which meet the credit needs of low to moderate persons and areas.

Please feel free to contact me with any questions.

Sincerely,



Doris R. Schnider  
Delaware Community Investment Corporation  
President



Clinton Walker  
Barclay's Bank  
DCIC Board Chairman