October 11, 2004

Mr. Robert E. Feldman Executive Secretary Attention: Comments/Legal ESS Federal Deposit Insurance Corporation 550 17th St. NW Washington DC 20429

2 0 2004

Ref: RIN 3064-AC50

Dear Mr. Feldman.

As a concerned citizen and a Christian who cares about those who are the least among us, I urge you to withdraw the FDIC proposed changes to the Community Reinvestment Act (CRA).

By requiring banks with assets greater than \$250 million to comply with the "three point audit test" of lending, investing, and providing banking services to low- and middle-income communities, the CRA has been one of the most successful community development programs. The CRA had provided \$1.5 trillion for housing developments, medical clinics, and other community projects that would never have been completed without the CRA.

Now your proposal will increase the small bank definition to banks with assets under one billion dollars. Thus, the "three point audit test" will no longer apply to most banks throughout the U.S. In my state of Illinois, this will leave only 13 banks that will still be required to meet the stricter lending, investing, and services standards. This will result in fewer loans and investments in affordable housing projects, clinics, community centers, and economic development projects. Along with the Section 8 housing voucher changes that result in less housing for poor residents, I believe the loss of loans and investments in affordable housing projects will worsen the already difficult low- and middleincome housing situation.

Your proposed changes do not uphold the purposes of the CRA. They should be withdrawn.

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Sincerely.

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