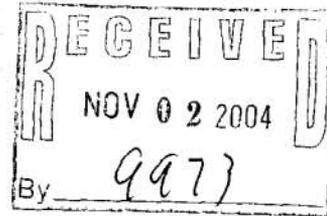


# Sisters of the Holy Family

"...to  
seek out  
and  
advocate  
for the  
poor and  
needy,  
especially  
families,  
  
for the  
kingdom  
of  
God..."

October 18, 2004



Mr. Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, DC 20429

Attention: Comments/Legal ESS  
Re: RIN 3064-AC50

Dear Mr. Feldman:

**Your organization** urges you to withdraw your proposed changes to the Community Reinvestment Act (CRA) regulations. CRA has been instrumental in increasing homeownership, boosting economic development, and expanding small businesses in the nation's immigrant, low- and moderate-income, and people of color communities.

Under the current CRA regulations, banks with assets of at least \$250 million are rated by performance evaluations that scrutinize their level of lending, investing, and services to low- and moderate-income communities. The proposed changes will eliminate the investment and service parts of the CRA exam for state-chartered banks with assets between \$250 million and \$1 billion. In place of the investment and service parts of the CRA exam, the FDIC proposes to add a community development criterion. The community development criterion would require mid-size banks with assets between \$250 million and \$1 billion to engage in only one of three activities: community development lending, investing or services. Currently, mid-size banks must engage in all three activities.

If enacted, 879 state-chartered banks with over \$392 billion in assets would become eligible for the streamlined and cursory exam. In total, 95.7 percent or more than 5,000 of the state-chartered banks that the FDIC regulates have less than \$1 billion in assets. These 5,000 banks have

159 Washington Blvd., P.O. Box 3248, Fremont, CA 94539-0324

Phone: 510-624-4596, FAX: 510-624-4550

Web Site: [www.holyfamilysisters.com](http://www.holyfamilysisters.com)

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combined assets of more than \$754 billion. In California, there are 146 state-chartered banks located within urban areas. 122 of these or 84% have assets up to \$1 billion and would be eligible for the streamlined exam.

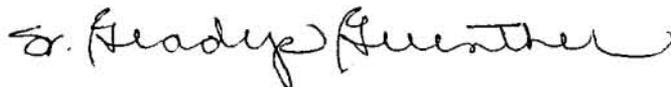
In rural California, there are 9 state chartered financial institutions with 8 of these having assets up to \$1 billion. If enacted, 89% of California's rural financial institutions would become eligible for the streamlined exam. The FDIC proposal would significantly harm community development activities in rural areas. The proposal states that a bank's rural community development activities could benefit any group of individuals instead of only low- and moderate-income individuals.

The FDIC's proposal would eliminate the small business lending data reporting requirement for mid-size banks. Mid-size banks with assets between \$250 million and \$1 billion will no longer be required to report small business lending by census tracts or revenue size of the small business borrowers.

In sum, the FDIC's proposal is directly opposite CRA's statutory mandate of imposing a continuing and affirmative obligation to meet community needs. The proposed changes will dramatically reduce community development lending, investing, and services. The proposal will particularly affect rural areas least able to afford reductions in credit and capital. Eliminating critical data on small business lending will also result in further reductions to the amount and type of small business lending. The Federal Reserve Board and the Office of the Comptroller of the Currency have recognized the harm this proposal would cause.

CRA is a vital reinvestment tool. If the FDIC refuses to reverse this proposed course of action, we will ask that Congress halt your efforts.

Sincerely,



Sister Gladys Guenther  
Congregational Vice President

cc: Senators John Kerry and John Edwards