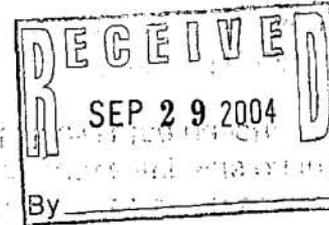




# National Conference of Black Mayors, Inc.

September 14, 2004

Mr. Robert E. Feldman  
Executive Director  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
55 17th Street NW  
Washington, DC 20429



RE: RIN 3064-AC50

Dear Mr. Feldman:

I am writing on behalf of the National Conference of Black Mayors, Inc. (NCBM) to express our opposition to proposed regulatory changes that would weaken the Community Reinvestment Act (CRA). NCBM is a member of the National Community Reinvestment Coalition ((NCRC) and is in complete agreement with NCRC that the revised regulations under consideration would have profoundly negative impacts on the nature and pace of community reinvestment all over the nation.

The majority of NCBM's membership represents small and rural municipalities and we are particularly concerned that the proposed regulations do not require banks to target low and moderate income individuals in rural areas. This is contrary to the intent of CRA legislation and would permit banks to focus on the affluent rather than responsible and hard-working households throughout the whole community. Also, it is short sighted and wrong to eliminate the investment and service requirements for banks with assets between \$25 million and \$1 billion, because 95% of FDIC regulated institutions can opt to do less under CRA. This means billions of dollars less for community development lending, investments and services. Finally, eliminating reporting requirements for mid size banks is certain to result in fewer loans to African Americans, women, and racial and ethnic minorities because of unlawful discrimination. If the law of the land is to be upheld, then the information gathering needed for effective enforcement must remain in place.

NCBM is a private, non profit, tax exempt network organization that provides information, technical assistance, and a collective voice for the nation's more than 500 mayors of African descent. Our membership is in 28 states, including mayors elected from some of the largest cities in the U.S., as well as mayors representing small cities and very small towns in the rural south and southeast. NCBM's

**Board of Directors**

**PRESIDENT**  
Mayor Harvey Johnson, Jr.  
Jackson, Mississippi

**1<sup>ST</sup> VICE PRESIDENT**  
Mayor Roosevelt F. Dom  
Inglewood, California

**2<sup>ND</sup> VICE PRESIDENT**  
Mayor Robert L. Bowser  
East Orange, New Jersey

**3<sup>RD</sup> VICE PRESIDENT**  
Mayor George L. Grace  
St. Gabriel, Louisiana

**TREASURER**  
Mayor Anthony Grant  
Eatonville, Florida

**ASSISTANT TREASURER**  
Mayor Floyd L. Griffin  
Milledgeville, Georgia

**SECRETARY**  
Mayor Clarence W. Hawkins  
Bastrop, Louisiana

**ASSISTANT SECRETARY**  
Mayor Rene H. Brodie, Ph.D.  
Robbins, Illinois

**PARLIAMENTARIAN**  
Mayor John F. Street  
Philadelphia, Pennsylvania

**HISTORIAN**  
Mayor Larry S. Bryant  
Forrest City, Arkansas

**SERGEANT-AT-ARMS**  
Mayor Milton Tutwiler  
Winstonville, Mississippi

**CHAPLAIN**  
Mayor Robert Taylor  
Marianna, Arkansas

**BLACK WOMEN MAYORS' CAUCUS**  
Mayor Lorraine Smith, Chair  
Wrightsville, Arkansas

Mayor Shirley S. Allen  
Mericafe, Mississippi

Mayor Clarence Anthony  
South Bay, Florida

Mayor Maurice Brown  
White Castle, Louisiana

Mayor DeWay Burris  
Fl. Coffee, Oklahoma

Mayor Christopher Campbell  
Eastover, South Carolina

Mayor Roger Carter  
Shaw, Mississippi

Mayor Michael Coleman  
Columbus, Ohio

Mayor Edward Daniel  
Merion, Alabama

Mayor Alfred Dixon  
Greeneviers, North Carolina

Mayor Jack Ellis  
Macon, Georgia

Mayor Felton Flagg  
Country Club Hills, Missouri

Mayor Helen JoAnn Fox  
Grayson, Oklahoma

Mayor Shirley Franklin  
Atlanta, Georgia

Mayor James A. Garner  
Hempstead, New York

Mayor Hilliard L. Hampton, Jr.  
Inkster, Michigan

Mayor Clifton Harris  
Aroola, Mississippi

Mayor Kennedy Johnson  
Mound Bayou, Mississippi

Mayor Kwame Kilpatrick  
Detroit, Michigan

Mayor Stanley Mosis  
Merifree, Arkansas

Mayor Lee P. Walker  
Landover Hills, Maryland

Mayor John White  
Ames, Texas

Mayor Anthony A. Williams  
Washington, DC

Mayor Wilbert A. Young  
Wilkinsburg, Pennsylvania

**Presidents Emeriti**  
Mayor Henry Espy  
Clarksdale, Mississippi

Mayor Marilyn Murrell  
Arcadia, Oklahoma

**Past Presidents**  
Marion Barry  
Unita Blackwell

Dr. Gordon D. Bush  
Rev. Emanuel Cleaver, II  
A. J. Cooper, Founder

**Johnny Ford, Founder**  
Richard G. Hatcher  
Dr. Robert B. Ingram

Jesse M. Norwood  
John H. Smith  
James L. Usty  
Wellington E. Webb

**Executive Director**  
Michelle D. Kourouma

Headquarters • 1151 Cleveland Avenue, Bldg. D

East Point, Georgia 30344

404.765.6444 • Fax 404.765.6430

[www.blackmayors.org](http://www.blackmayors.org)

mission is to improve the executive management capacity of its membership.

I urge you to recognize how underserved communities and ultimately the greater society will be harmed by these regulatory changes, and to decide against them.

Sincerely,



Michelle D. Kourouma  
Executive Director

Cc: Mayor Harvey Johnson  
President George W. Bush  
Senator John Kerry  
Senator John Edwards