

From: John Biebel [mailto:john.biebel@calibre.com]
Sent: Monday, April 18, 2005 2:49 PM
To: 'regs.comments@federalreserve.gov'; Comments; 'regs.comments@occ.treas.gov'
Cc: 'membership@ncrc.org'
Subject: CRA

Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington DC 20551
RE: Docket No. R-1225

Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th St. NW 20429
RE: RIN 3064-AC89

Office of the Comptroller of the Currency
250 E St. SW, Mail Stop 1-5
Washington 20219
RE: Docket Number 05-04

Dear Sirs and Madams:

I am writing once again to urge you to enhance your proposed changes to the Community Reinvestment Act (CRA) regulations so that banks do not reduce their levels of branches, and community development loans and investments to low- and moderate-income communities. Your proposal is an improvement from the one you issued in the fall, but serious issues remain. I am a financial advisor. I have several clients committed to strengthening communities through their investments. The CRA has generated numerous opportunities for them to do so.

I am pleased that you have dropped your proposal to allow mid-size banks with assets between \$250 million to \$1 billion to offer either community development loans, investments or services. Banks must be expected to engage in all three of these essential community development activities in order to pass their CRA exams as your current proposal requires. I still believe that the current exam structure is the most effective for maximizing the level of community development financing. If you move to a new exam format, you must ensure that significant declines of community development financing do not occur.

Investments in affordable housing and economic development build wealth for families and communities and thus open up new markets for bank lending and services. The importance of investments is one reason why you must carefully develop any final proposal regarding the CRA exam structure.

I am also concerned that deleting a separate test for services will result in CRA exams no longer holding mid-size banks accountable for the provision of bank branches and low-cost accounts in low- and moderate-income communities. Payday lending and other high cost credit has increased in my community the last several years. The last thing we need are CRA exams that no longer look at the number of bank branches in traditionally underserved communities. Please add the provision of bank branches as a clear factor on your proposed CRA exams for mid-size banks.

I urge you to drop your proposed elimination of public data disclosure requirements regarding community development, and small business and small farm lending. The only way to hold mid-size banks accountable for providing credit to small firms and for affordable housing and community development is if the CRA data remains publicly available. You must not change the requirement that community development in rural areas must benefit low- and moderate-income areas and distressed communities. Thank you for your consideration of my comments.

Sincerely,

John H. Biebel

cc: National Community Reinvestment Coalition

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