

**From:** Kathryn Hazelett [mailto:kathryn.hazelett@aradvocates.org]  
**Sent:** Thursday, May 05, 2005 1:01 PM  
**To:** regs.comments@federalreserve.gov; Comments; regs.comments@acc.treas.gov  
**Subject:** Comments on Proposed Regulations for CRA

**Federal Reserve Board**

E-mail: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)  
Fax: 202-452-3819 or 202-452-3102  
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

**Federal Deposit Insurance Corporation**

E-mail: [Comments@FDIC.gov](mailto:Comments@FDIC.gov)  
No faxes  
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**

E-mail: [regs.comments@occ.treas.gov](mailto:regs.comments@occ.treas.gov)  
Fax: 202-874-4448  
Office of the Comptroller of the Currency  
250 E St. SW, Mail Stop 1-5  
Washington 20219  
RE: Docket Number 05-04

To Whom It May Concern:

As a child advocate in the state of Arkansas who has been part of a coalition to prevent payday lending, I am concerned about the provision in your proposed rule changes that no longer requires bank branch location to be considered in the CRA audit. As you know, payday lenders prey on our low-income working families. When those families have less access to traditional banking services, they are more likely to go to a payday lender. Encouraging banks to maintain branches in low-income communities is a vital component to preventing the spread of payday lenders. Please ensure that banks are adequately serving our low-income communities. Arkansans need bank branches that serve all of our citizens.

I am also concerned that you are proposing to eliminate the separate lending test; a likely outcome is that less investment will go where it is needed the most.

Thank you for taking the time to consider my comments.

Sincerely,

Kathryn Hazelett  
Research Director  
Arkansas Advocates for Children & Families  
523 South Louisiana, Suite 700  
Little Rock, Arkansas 72201