

From: edownie@voyager.net [mailto:edownie@voyager.net]
Sent: Friday, May 06, 2005 11:38 AM
To: regs.comments@occ.treas.gov; regs.comments@federalreserve.gov; Comments
Subject: Docket No. R-1225, RIN 3064-AC89, and Docket No. 05-04

Federal Reserve Board
Re: Docket No. R-1225

Federal Deposit Insurance Corporation
Re: RIN 3064-AC89

Office of the Comptroller of the Currency
Re: Docket Number 05-04

Dear Sir or Madam:

As a trustee of a Michigan interfaith community development loan fund and as a socially responsible investor, I am a strong supporter of the Community Reinvestment Act, which has helped ensure that people and businesses in underserved communities have access to vitally needed capital.

I thank you for withdrawing your earlier proposal to allow midsize banks to pursue only one type of community development activity — loans, investments, or services — rather than all three.

However, I urge you to withdraw the proposed new changes under which CRA exams would no longer look at how many branches a bank operates in underserved communities, and banks would no longer have to disclose data on how much credit they provide for community development, small farms, and small businesses. Banks must be held accountable for serving struggling communities, and the public must be able to make sure they are meeting their obligations. The transparency provided by required disclosure is essential to ensuring that the CRA remains effective.

Yours Sincerely,

The Rev. Elizabeth Morris Downie