

From: Peter Carey [mailto:peterc@selfhelpenterprises.org]  
Sent: Saturday, May 07, 2005 6:13 PM  
To: Comments  
Subject: OCC Docket Number 05-04/RI-1225/RIN 3064-AC89

Peter Carey  
PO Box 6520  
Visalia, CA 93290

May 7, 2005

Robert Feldman  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

Dear Robert Feldman:

As an organization which has served the community development needs of California's 15,000 square mile San Joaquin Valley for over 40 years, Self-Help Enterprises first-hand how a strong Community Reinvestment Act has facilitated investment in poor rural communities.

We support a maintaining the Three-Part Test. The proposed "community development" test, even with the requirement of a "Satisfactory" rating on both tests to get a "Satisfactory" CRA rating, is not adequate to ensure investment dollars and retail financial services reach low-income communities.

Underserved rural areas should be defined by the CDFI Fund's definition, incorporating outmigration and population loss as well as poverty and income statistics. It is possible that the CDFI Fund's definition is too narrow, even with the other three individual criteria to be feasible. If so, the 90% of Area Median Income could suffice.

Please keep the requirement that "intermediate small banks" report on originations and purchases of small business, farm, and community development loans.

Thank you for the opportunity to comment.

Sincerely,

Peter Carey