

From: Sue Southon [mailto:ssouthon@earthlink.net]
Sent: Friday, May 06, 2005 12:17 PM
To: Comments
Subject: OCC Docket Number 05-04/RI-1225/RIN 3064-AC89

Sue Southon
CDAD, 2727 Second, Ste. 120,
Detroit, MI 48201

May 6, 2005

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

Dear Robert Feldman:

As a member of the National Congress for Community Economic Development and the International Economic Development Council, our organization, Community Development Advocates of Detroit represents over 60 active community development organizations in the City of Detroit which are working to revitalize their neighborhoods. The CRA requirements are strong tools to ensure continuing investment and financial services will be available to our members.

We support maintaining the "Three Part Test. The proposed "community development" test, even with the requirement of a satisfactory rating on both test to receive a "satisfactory" CRA rating is not adequate to ensure the necessary investment dollars and retail financial services will be available to low-income communities.

We do not support the "designated disaster areas" addition to the definition of community development. The standard CRA designation is sufficient.

"Underserved rural areas" should be defined by the CDFI Fund's definition, incorporating outmigration and population loss as well as poverty and income statistics. If it is determined that the CDFI's definition is too narrow, the 90% of Area Median Income criteria could suffice.

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

Thank you for the opportunity to comment on these critical community development issues.

Sincerely,
Sue Southon, Executive Director
313-964-4910