From: Jim Buckley [mailto:jim@unhp.org] Sent: Tuesday, May 10, 2005 3:02 PM

To: Comments

Subject: Re: RIN 3064-AC89

Robert Feldman FDIC 550 17<sup>th</sup> Street, NW Washgington, 20429

As we have on past occasions, UNHP is submitting comments urging a reconsideration of the proposed regulation and a revision strengthening community reinvestment regulations to ensure the continuation of safe and sound investment in our community, the improvement of critical branch services and the expansion of community development lending. We opposed attempts in the past to allow banks of less than 1 billion in assets to be exempted from certain CRA requirements. While we appreciate that you eliminated the proposal to allow banks to offer either community development loans or services, we are concerned that the proposal does not in fact improve upon the existing three level test on lending, investment and community development financing.

Thanks for your attention.

Jim Buckley Director

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