

From: Ron Grzywinski [mailto:Ron_Grzywinski@sbk.com]
Sent: Monday, May 09, 2005 12:56 PM
To: Comments
Subject: RE: RIN 3064-AC89

Mr. Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

VIA Email: comments@FDIC.gov

RE: RIN 3064-AC89

Dear Mr. Feldman:

ShoreBank, the first and leading community development and environmental banking company in the USA, is a \$1.7 billion corporation headquartered in Chicago, with banks and affiliated nonprofits in Chicago; Cleveland; Detroit; Ilwaco, Washington; and Portland, Oregon. Our Chicago/Detroit Bank is a \$1.5 billion entity that effectively serves low- and moderate-income communities in Chicago and Detroit. All of our branches are located in low- and moderate- income communities. We know and understand community development and as a regulated and successful bank salute you. We want to encourage you to ask the OTS to rescind its recent CRA rule changes and join with you and the other regulators on an interagency proposal.

Specifically we ask that you consider the following when deliberating any proposed changes to CRA:

- Public data disclosure requirements regarding community development, small business and small farm lending must not be deleted or eliminated. Public access to information is the most effective way to assure that the intention of the original legislation is satisfied.
- There should be no change that would reduce fair and equitable availability of banking offices in low-income neighborhoods.
- The provision of services and investment in low-income and rural communities should be strongly encouraged. If you are trying to increase the incentives for insured institutions to address rural needs, we recommend that you offer an institution the option of using a broader definition of community development that addresses unique local conditions and rural communities.

Thank you for your consideration of this matter.

Sincerely,

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