April 10, 2005

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

RE. RIN 3064-AC89

Dear Mr. Feldman:

I urge you to enhance your proposed changes to the Community Reinvestment Act (CRA) regulations so that banks do not reduce their numbers of branches, and community development loans and investments to low-and moderate-income communities. Your proposal is an improvement from the one you issued in the fall, but serious issues remain.

The current exam structure is the most effective for maximizing the level of community development financing. If you change to a new exam format, you must ensure that significant declines of community development financing do not result.

Deleting a separate test for services resulting in CRA exams no longer holding mid-size banks accountable for the provision of bank branches and low-cost accounts in low- and moderate-income communities also concerns me. Payday lending and other high cost credit has increased in my community the past several years. We do not need CRA exams that no longer look at the number of bank branches in traditionally underserved communities. Please add the provision of bank branches as a clear factor on your proposed CRA exams for mid-size banks.

I urge you to drop your proposed elimination of public data disclosure requirements regarding community development, and small business and small farm lending. Mid-size banks can be held accountable for providing credit to small firms and for affordable housing and community development only if the CRA data remains publicly available. The requirement that community development in rural areas must benefit low- and moderate-income areas and distressed communities is very necessary and must not be changed.

Thank you for considering my comments.

Sincerely yours,

Mary Compton
Mary Compton, president
Unidos Para la Gente

cc: National Community Reinvestment Coalition