



THE DELAWARE BANKERS ASSOCIATION

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VIA ELECTRONIC MAIL

March 31, 2005

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Mr. Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
comments@FDIC.gov
Re: RIN 3064-AC89

Ms. Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street & Constitution Avenue, N.W.
Washington, DC 20551
Regs.comments@federalreserve.gov
Re: Docket No. R – 1225

Ms. Julie L. Williams
Acting Comptroller of the Currency
Office of the Comptroller of the Currency
250 E Street, S.W.
Mail Stop 1-5
Washington, DC 20219
Regs.comments@occ.treas.gov
Re: Docket No. 05-04, RIN 1557 – AB98

Re: Community Reinvestment Act Regulations

Dear Madams and Sir:

I am David G. Bakerian, President of the Delaware Bankers Association (DBA). The DBA is a not-for-profit, private trade association that represents thirty-eight (38) dues and tax paying financial institutions chartered to do banking business in the State of Delaware. Our member banks range in size from \$5 million to over \$138 billion. Combined, these institutions maintain assets of over \$300 billion in the State. Accordingly, we are filing this comment on their collective behalf. We appreciate the opportunity to comment on this important matter.

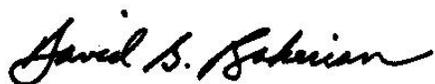
Under the Community Development Definition and Test, we have a specific issue unique to Delaware, but applicable nationally, that we consider worthy of your review and consideration. Currently, each of the regulatory agencies is promoting financial literacy as an important national initiative for the overall financial well being of our country. Likewise, the banking industry is being encouraged to promote financial literacy programs to their customers and in their local schools and communities. However, under the current Community Reinvestment Act (CRA) and its regulations, banks only receive CRA credit if their programs target Low-Moderate Income (LMI) schools and communities. The Delaware banking community has developed several highly effective financial literacy programs for students that also meet Delaware economic education standards for school children in grades K – 12 including, but not limited to: *Teach Children To Save Day*, *Keys to Financial Success*, *Senior Credit Day* and the *Bank in School* program. However, in Delaware, due to desegregation, there are no schools in the State that meet the 51% LMI student body threshold that would allow banks to receive CRA credit for helping to support and fund these important initiatives.

Furthermore, since financial literacy cross cuts all socio-economic groups regardless of geographic location, and in light of the recently proposed Social Security Reform that will allow individuals to control their own Social Security retirement funds, as well as the exponential increase of bankruptcies for all economic groups, we request that consideration be given to the expansion of CRA credit in the banking community for financial literacy initiatives that include, but also go beyond, the LMI population to improve the overall economic well being of our country.

In conclusion, we believe that the Agencies have proposed improvements in the CRA regulations; however, we believe that the entire nation will benefit from the inclusion of financial literacy education for all socio-economic groups regardless of geographic location as a qualified CRA activity by banks. I will be happy to discuss these issues further with you, if that would be helpful.

As always, we would be pleased to provide any additional information. You may contact me at 302-678-8600 or at David.Bakerian@debankers.com.

Very truly yours,



David G. Bakerian
President