

Name: Neubauer
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October 5, 2004

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th St. NW 20429
Washington, DC 20429

RE: RIN 3064-AC50

Dear Mr. Feldman:

I am a concerned citizen opposed to watering down CRA (Community Reinvestment Act) requirements for mid-sized banks.

I understand that banks with over \$250 million in assets must be tested on their number of loans, investments, and services to low- and moderate-income communities. But your proposal would eliminate the investment and service requirements for all banks with under \$1 billion in assets. Seven additional banks in Delaware, bringing up the total to 20 banks, will lower their involvement in community economic development.

Right now, mid sized banks must make community development loans, investments, **and** services. Your proposed test allows banks to choose only one of the three activities.

You also propose that community development activities in rural areas should benefit any group of individuals instead of only low- and moderate-income individuals. Lower income consumers need CRA loans, services and investments.

You would also eliminate publicly available data on the small business lending of mid-sized banks. Without data, banks cannot be held accountable for lending to small businesses in their neighborhoods.

Thank you for this opportunity to comment on a proposal that so significantly impacts us consumers.

Sincerely,



Cc: Delaware Community Reinvestment Action Council, Inc.