



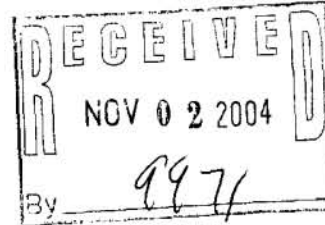
# The Urban League of Broward County, Inc.

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October 26, 2004

Mr. Robert E. Feldman  
Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
550 17th St. NW  
Washington, DC 20429-9990



RE: RIN 3064-AC50

Dear Mr. Feldman:

I am writing from The Urban League of Broward County, a not for profit organization whose mission is to assist African Americans in the achievement of social and economic equality. One of our program focus areas is community development in low and moderate-income areas. Our organization opposes watering down the Community Reinvestment Act (CRA) requirements for mid-sized banks. CRA is vital for increasing homeownership and economic development in lower-income communities. However, your proposed changes will halt the progress that has been made.

We 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. The current FDIC proposal would eliminate the investment and service requirements for all banks with under \$1 billion in assets. This will result in significantly fewer loans and investments in affordable rental housing, health clinics, community centers and economic development projects.

In the watered-down exam, the FDIC would allow mid-sized banks to choose which community development activities they will undertake. Right now, these same banks must make community development loans, investments and services. Your proposed test allows banks to choose only one of the three activities. The result will be less community development activity.

The FDIC also proposes that community development activities in rural areas should benefit any group of individuals instead of only low and moderate-income individuals. This will allow banks to cherry-pick and focus on affluent residents of rural areas rather than the lower income consumers. Finally, the proposed changes would also eliminate publicly available data on the small business lending of mid-sized banks. Without data, community groups and citizens cannot hold banks accountable for lending to small businesses in their neighborhoods.

The FDIC's changes directly oppose CRA's mandate to require lenders to meet community needs. CRA is too important to be gutted. Please drop this proposal like the two other federal agencies that recognized the harm these changes would inflict on underserved communities.

Sincerely,

Donald E. Bowen  
President & CEO

EMPOWERING  
33311

Central County  
Community  
Development  
Initiative

A Return  
to Our Roots  
- From Rights to  
Responsibilities.