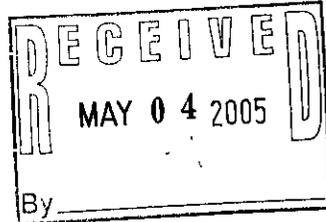


**The Housing  
Research & Advocacy  
Center**

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April 12, 2005

**Jennifer J. Johnson, Secretary**  
Board of Governors of the Federal Reserve  
System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington DC 20551  
RE: Docket No. R-1225

**Robert E. Fledman, Executive Secretary**  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington DC 20429  
Attention: Comments  
RE: RIN 3064-AC89

**Office of the Comptroller of the Currency**  
250 E Street, SW, Mail Stop 1-5  
Washington DC 20219  
RE: Docket Number 05-04

**To Whom It May Concern:**

We urge you to enhance your proposed changes to the Community Reinvestment Act (CRA) regulations so that banks do not reduce their levels 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

We still believe that the current exam structure is the most effective for maximizing the level of community development financing. If you move to a new exam format, you must ensure that significant declines of community development financing do not occur.

We are also concerned that deleting a separate test for services will result in CRA exams no longer holding mid-size banks accountable for the provisions of bank branches and low-cost accounts in low- and moderate-income communities. Payday lending and other high cost credit has increased in our community the last several years. The last thing we need are 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.

We urge you to drop your proposed elimination of public data disclosure requirements regarding community development, and small business and small farm lending. The only way to hold mid-size banks accountable for providing credit to small firms and for affordable housing and community development is if the CRA data remains publicly available. You must not change the requirement that community development in rural areas must benefit low- and moderate-income areas and distressed communities.

Thank you for your consideration of our comments.

Sincerely,

Harold A. Madorsky  
Acting Executive Director

cc: National Community Reinvestment Coalition