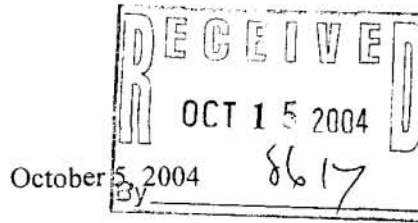


NEIGHBORHOOD HOUSE, INC.

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(302) 378-7217
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Mr. Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corp.
550 17th Street, N.W.
Washington, D. C. 20429

Re: Comments RIN 3064-AC50

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Arthur W. Boswell
Executive Director

Dear Mr. Feldman:

Neighborhood House, Inc. (NHI) is pleased to join with the Delaware Community Reinvestment Action Council (DCRAC) in vigorous opposition to the proposed redefinition of small banks under the Community Reinvestment Act.

NHI enjoys a proud history of nearly eighty years of continuous service delivery to the residents of Southbridge – Wilmington, Delaware's oldest and, arguably, most economically challenged neighborhood.

We are therefore all too familiar with the history of redlining, discrimination and disinvestment which summarized the local banking community's response to Southbridge prior to the requirements and expectations of the Community Reinvestment Act.

By significantly increasing the number of banks which would be subjected to a reduced set of community development criteria, the rule change will substantially reduce the range and impact of the legislation. As the Community Reinvestment Act is weakened, predatory lending practices and the predictable negative impacts upon the financially weak are magnified.

At a time when at-risk communities are particularly fragile, any reduction to the impact of their few structured supports is ill-conceived and potentially disastrous.

We expect better from FDIC and our federal regulatory apparatus.

Sincerely,

Arthur W. Boswell
Executive Director

AWB:jam

The Honorable George W. Bush
The Honorable Joseph R. Biden
The Honorable Thomas Carper
The Honorable Michael N. Castle
Rashmi Rangan, Esquire, DCRAC