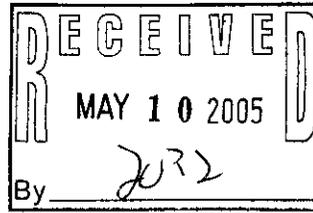


Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
559 17th St., NW
Washington, DC 20429
RE: RIN 3064-AC89



To Whom It May Concern.

I 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.

I am pleased that you have dropped your proposal to allow mid-size banks with assets between \$250 million and \$1 billion to offer either community development loans, investments or services. Banks must be expected to engage in all three of these essential community development activities in order to pass their CRA exams as your current proposal requires. I still believe that the current exam structure is the most effective way to maximize the level of community development finances. If you move to a new exam format, you must ensure that significant declines of community development financing do not occur.

Investments in affordable housing and economic development build wealth for families and communities and this opens up new markets for bank lending and services. The importance of investments is one reason why you must carefully develop any final proposal regarding the CRA exam structure.

I am also concerned that deleting a separate test for services will result in CRA exams no longer holding mid-size banks accountable for the provision of bank branches and low-cost accounts in low- and moderate-income communities. Payday lending and other high cost credit has increased in communities around the country in the last several years. The last thing we need is a CRA exam that no longer looks 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.

I urge you to drop your proposed elimination of public data disclosure requirements regarding community development, and small businesses 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 my comments.

Sincerely,



Georgia Fowler

cc. National Community Reinvestment Coalition

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