

From: Jason Perlmutter [mailto:rrcj@reynoldstown.org]  
Sent: Tuesday, May 10, 2005 2:43 PM  
To: Comments  
Subject: OCC Docket Number 05-04/RI-1225/RIN 3064-AC89

Jason Perlmutter  
PO Box 89092  
Atlanta, GA 30312

May 10, 2005

Robert Feldman  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

Dear Robert Feldman:

Dear Congressman,

I support a maintaining the Three-Part Test. The proposed "community development" test, even with the requirement of a "Satisfactory" rating on both tests to get a "Satisfactory" CRA rating, is not adequate to ensure investment dollars and retail financial services reach low-income communities.

I do not support the "designated disaster areas" to the definition of community development. The standard CRA designation should qualify.

Please keep the requirement that "intermediate small banks" report on originations and purchases of small business, farm, and community development loans.

Thank you for the opportunity to comment.

Sincerely,

Jason Perlmutter