

From: LueVenía Scott [mailto:luescott@cceda.com]
Sent: Tuesday, May 10, 2005 2:36 PM
To: Comments
Subject: OCC Docket Number 05-04/RI-1225/RIN 3064-AC89

LueVenía Scott
CA Community Economic Dev. Assn. , 1430 Franklin Street, Suite 101
Oakland, CA 94612

May 10, 2005

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

Dear Robert Feldman:

As a member of the National Congress for Community Economic Development (NCCED), I support a strong CRA.

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.

Underserved rural areas should be defined by the CDFI Fund's definition, incorporating outmigration and population loss as well as poverty and income statistics. It is possible that the CDFI Fund's definition is too narrow, even with the other three individual criteria to be feasible. If so, the 90% of Area Median Income could suffice.

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,
LueVenía Scott