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January 22, 2007

Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

Re: Docket No. 2006-44

Dear Sir or Madam:

Enterprise Community Partners appreciates the opportunity to comment on the Office of Thrift Supervision's Notice of Proposed Rulemaking (NPR), published November 24, 2006, which proposes to align OTS' Community Reinvestment Act (CRA) regulations with those of the other banking regulators – the Office of the Comptroller of the Currency (OCC), the Federal Reserve, and the Federal Deposit Insurance Corporation (FDIC).

We strongly support OTS's proposed alignment with the three other regulators. We believe consistency among regulators is important to communities and financial institutions with respect to transparency and accountability to the mission and intent of the CRA. The CRA continues to be critical in increasing homeownership, preserving multifamily rental housing and stimulating economic development. Community investments by banks, fueled by the CRA, provide financing for affordable rental housing using Low Income Housing Tax Credits; this system is responsible for most of the new affordable housing produced today.

Enterprise is a leading provider of the development capital and expertise it takes to create decent, affordable homes and rebuild communities. For more than two decades, Enterprise has pioneered neighborhood solutions through public-private partnerships with financial institutions, governments, community organizations and others that share our vision. Enterprise has raised and invested \$7 billion in equity, grants and loans and is currently investing in communities at a rate of a \$1 billion a year.

Our partners in this work include large thrifts regulated by the OTS and obligated to uphold the CRA. In our 25 years of partnering with financial institutions to revitalize communities, there has been no federal policy more important to expanding housing and economic opportunity to low-income families and communities than the CRA.

We urge the OTS to enact its proposal to align CRA regulations with those of the other regulators expeditiously. Please contact us with any further questions.

Sincerely,

Stockton Williams
Senior Vice President, External Affairs
Enterprise Community Partners, Inc.