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January 23, 2007

Regulation Comments, Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

By e-mail: regs.comments@ots.treas.gov

Re: No. 2006-44--Proposed changes to the Office of Thrift Supervision's Community Reinvestment Act Regulation

To whom it may concern:

JPMorgan Chase Bank, N.A. ("JPMorgan Chase") appreciates the opportunity to comment upon the proposal (the "Proposal") of the Office of Thrift Supervision ("OTS") regarding proposed changes to the OTS's Community Reinvestment Act ("CRA") regulation.

JPMorgan Chase Bank supports the Proposal. We note that the purpose is to "promote consistency and help facilitate objective evaluations of CRA performance across the banking and thrift industries" and that "consistent standards could allow the public to make more effective comparisons of bank and thrift CRA performance." JPMorgan Chase has long supported consistency among the bank regulatory agencies both in the content of their CRA regulations and in the examinations of their banks. The Proposal will eliminate any differences in content among the bank regulatory agencies and will promote an even playing field among banks and thrifts with different regulators.

JPMorgan Chase notes, however, that the OTS's prior CRA regulation attempted to resolve difficulties some banks and thrifts have had with aligning the lending, investing and services test with their business plan, in part by permitting thrifts some discretion in determining the weights given to the lending, investment and services test under the large retail bank test. JPMorgan Chase supports continued dialogue among the bank regulatory agencies in this regard and suggests that the OTS renew its discussions of this issue with the other bank regulatory agencies in an effort to find a satisfactory solution to this important issue.

I would be happy to discuss this with you further.

Sincerely yours,

A handwritten signature in black ink, consisting of several overlapping, slanted strokes that form a stylized, illegible name.