

From: Mary Compton [mcspirit@centurytel.net]
Sent: Friday, January 19, 2007 10:44 PM
To: Comments, Regs
Subject: Re: Comment on OTS CRA Proposal
January 19, 2007

Sirs:

I have copied and pasted my comment below for your convenience.

Mary Compton

UNIDOS PARA LA GENTE

P. O. Box 341

San Marcos, Texas 78667

January 18, 2007

Regulation Comments

Chief Counsel's Office

Office of Thrift Supervision

1700 G Street NW

Washington, DC 20552

Attention: No. 2006-44

To Whom It May Concern:

I am a member of National Community Reinvestment Coalition and agree that your proposed changes to Community Reinvestment Act (CRA) exams will increase lending, investing and bank services in low- and moderate-income communities. I urge your agency to implement your proposed changes as soon as possible.

In order that the public can effectively compare the CRA performance of banks and thrifts, the federal agencies must establish the same CRA exams. Currently, banks and thrifts with similar assets in my locality have very different CRA exams, with thrifts having weaker CRA standards. Subsequently, it is very difficult to hold thrifts accountable for responding to community needs.

Mid-size banks have CRA exams that consist of a lending test and a community development test, while mid-size thrifts with assets between \$250 million to \$1 billion currently have only a lending test. The community development test rates a mid-size bank on the number of investments, bank services, and loans

for affordable housing and economic development in low- and moderate-income communities. Mid-size banks are expected to offer a greater range of loans, investments, and services than mid-size thrifts in my community.

Also, large thrifts with assets greater than \$1 billion have lower CRA requirements than large banks. Large thrifts must undergo a lending test, but they can choose not to have an investment test and a service test. Instead, large thrifts can choose to have their investment and service test count for a minimal amount towards their CRA rating. In contrast, large banks always have a CRA exam in which the lending test counts for 25% of the rating. The large bank test has worked well for increasing bank lending, investing, and services in low- and moderate-income communities. I urge the OTS to establish consistent standards for large thrifts by using the predictable weighting scheme of the large bank exam.

In addition, I ask the OTS to implement its proposal to add an anti-predatory lending screen to its CRA regulation. If they engage in illegal, discriminatory, and abusive lending practices, saving and loans must be held to the same standard as banks including penalties, if they issue abusive loans that drain equity from communities.

I ask the OTS to enact its proposal to align the CRA exams with those of the other agencies as quickly as possible. Thank you for your consideration of this matter so important to the communities. If you have questions, please contact me at 512-396-2978.

Sincerely,

Mary Compton, president

Unidos Para La Gente

cc: National Community Reinvestment Coalition

----- Original Message -----

From: [Comments, Regs](#)

To: [Mary Compton](#)

Sent: Friday, January 19, 2007 2:55 PM

Subject: RE: Comment on OTS CRA Proposal

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-----Original Message-----

From: Mary Compton [mailto:mcspirit@centurytel.net]

Sent: Friday, January 19, 2007 3:22 PM

To: Comments, Regs

Cc: Josh Silver

Subject: Comment on OTS CRA Proposal

January 19, 2007

Please see my attached comment on OTS CRA Proposal.

Thank you.

Mary Compton, president

Unidos Para La Gente