



222 S. Riverside Plaza, Suite 2200  
Chicago, IL 60606-6109  
312.258.0070 Fax 312.258.8888

**Community Investment Corporation**  
*Chicagoland's Leading Neighborhood Revitalization Lender*

www.cicchicago.com

January 11, 2007

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

15

962649

**Re: Docket No. 2006-44**

We at Community Investment Corporation in Chicago appreciate the opportunity to submit comments on the agency's Notice of Proposed Rulemaking (NPR), published November 24, 2006, which proposes to align OTS' Community Reinvestment Act (CRA) regulations with those of the Office of the Comptroller of the Currency (OCC), the Federal Reserve, and the Federal Deposit Insurance Corporation (FDIC).

The FDIC, the OCC, and the Federal Reserve have jointly issued a rule that expands the definition of community development, and also: 1) requires all banks to support their communities through meaningful services and community development loans and investments; 2) reinforces the fact that some lending practices can count against an institution in a CRA exam. The joint rule allows banks more leeway in fulfilling CRA requirements and ensures that LMI individuals and communities continue to be well served by the banks that operate in their area.

**WE STRONGLY SUPPORT ALIGNMENT WITH THE THREE OTHER AGENCIES.** The CRA has been vital to building emerging markets nationwide. Lending and equity investing in underserved communities have already spurred economic growth and demand, thereby increasing opportunities to make more loans and sell more services. Consistency among the regulators helps the communities and insured institutions to maximize these opportunities. It also prevents a regulatory "race to the bottom."

Thank you for your consideration.

Sincerely,

MARTIN A. BERG  
Director of Marketing & Communications

cc: John Pritscher, CIC President