

From: Mary Cruz
Subject: CRA Regulations Hearings

Comments:

August 17, 2010

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, D.C. 20551

RE: Docket ID OCC-2010-0011, R-1386, RIN 3064-AD60

Dear Ms. Johnson:

Because of my family's personal situation, I have come to be associated with "People Acting In The Community Together" (PACT). The following are personal comments on the Agencies' hearings to review aspects of Community Reinvestment Act (CRA) regulations, and how the Agency should revise these regulations to better serve the goals of CRA and meet the needs of under-served communities. These revisions are particularly important, because of the current lack of bank/lender response to borrowers especially, those borrowers in low-income communities.

PACT has connected me with community members of low-income and color that are going through a similar situation as my family. This organization has exposed me to how geographically, socio-economically and racially the banks have not been responding to certain borrower's circumstances. Also, PACT has provided a forum for promoting fair and equitable solutions to housing issues.

For more than three decades, CRA has meant sound products being offered to under-served communities. The regulatory agency needs to look at the following key issues, during the CRA Hearings, to continue to meet these communities:

- Banks should be held responsible for CRA activity in non-metropolitan and rural areas, not just major metropolitan areas.
- Bank products/services should fit the needs of all income levels.
- All components of the financial corporation should be examined by the regulatory agency for their banking activity, to help eliminate predatory practices that may take place with affiliates.
- It would be beneficial to collect separate data on smaller businesses earning less than \$500,000 in annual revenue. Also, to collect separate data on lending to minority-owned and women-owned businesses would be beneficial.
- A restriction should be placed on banks giving credit for

loans for development of multifamily housing unless the housing deed is restricted to low income-tenants.

As an associate of PACT, I look forward to seeing the implementation of these revisions to the regulations this year,

Mary Cruz