

**NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE**  
**NORTH.S.D. COUNTY BRANCH · P.O. BOX 5786 · OCEANSIDE, CA 92052**

Docket No. **04-06**  
Communications **D**ivision  
**P**ublic Information Room, Mailstop 1-5  
Office of the Comptroller of the Currency  
250 E St. SW,  
Washington 20219

Docket No. **R-1181**  
Jennifer J. Johnson  
Secretary  
**B**oard of **G**overnors of the Federal **R**eserve System  
20th Street and ~~Constitution~~ Avenue, NW  
Washington DC 20551

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal **D**eposit Insurance Corporation  
550 17th St NW  
Washington DC **20429**

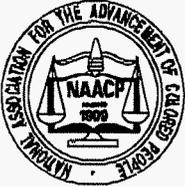
Regulation Comments, Attention: No. 2004-04  
Chief Counsel's **O**ffice  
**O**ffice of Thrift Supervision  
1700 G Street NW  
Washington DC 20552

April 2, 2004

Dear Officials of Federal Bank and **T**hrift Agencies:

**A**s president of the North San Diego County NAACP, I strive to support community activities that empower underserved community members with the knowledge necessary to improve their social and economic status. This mission, requires the support of community based organizations, government, and the business community. The CRA is a key government act making it mandatory for Banks to consider underserved communities when they make banking policies. While some of our banking partners are gracious with banking services and training, if you weaken the CRA regulations, you will make it easier to forget about underserved communities when future decisions are made.

The NAACP does a report card on the banking industry. The best scores are in the areas covered by the CRA. If you must make changes, you should strengthen the CRA to address the proliferation of predatory lending in poor communities and communities of color. As individual citizens, small business owners and community organizations, we have little



**NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE**  
**NORTH S.D. COUNTY BRANCH · P.O. BOX 5786 · OCEANSIDE, CA 92052**

power alone to fight the mega mergers in banking. The mega **mergers** weaken the support base for community-based organizations and the citizens working hard every day with **low** wages and little **benefits**. These are the citizens in need **of strong** CRA regulations to keep loans fair, lending predators at bay, and support and training so financial literacy becomes the norm.

**I am looking** to you to keep the small bank definition at **\$250** million in assets. That **along** with stronger predatory lending standards is a must for CRA regulations. Add to that, lower **CRA** grades for unfair loan practices, **and** you **are** on the right Track to help the communities that need **it** the most.

Do not ease the CRA restrictions at a time when they **need** more teeth. **Many** communities **are** working hard **to** improve, but lowering the **standards** required will only make it more difficult to reach the American Dream. Thank you for taking the time to listen.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Howard', is written over a light gray rectangular background.

Rob Howard, President  
North San Diego County NAACP

cc:  
National Community Reinvestment Coalition  
President George W. Bush  
Treasury Secretary John W. Snow