

Dear Officials of Federal Bank and Thrift Agencies:

As a banking customer I would like to urge you to change your proposed Community Reinvestment Act (CRA) regulation before finalizing it. I believe you need a stronger predatory lending standard **and** I believe you should keep the small bank definition as it is **at** \$250 million in assets.

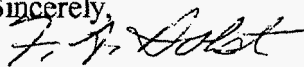
I hate **rip-off** lenders **who** do what you call "asset-based lending" and try to force borrowers into foreclosure so they can take over their homes. However, there are a whole bunch of other **ways** that seemingly good banks take advantage of customers who don't understand the loan process. I think the regulators should use the **CRA exams** to **penalize** lenders who **push high** cost loans with **high** fees and those who get you into a bad loan and then **try** to **flip** you into **an** even worse loan. I hate prepayment penalties that keep you **from** getting out of **a** bad loan and **single** premium credit insurance policies that **cost** a lot but **don't** really help the customer. Lower a bank's CRA rating when **they** do stuff like that.

The big banks are getting so big that to **think they would** actually do **much** for regular folks is a joke, so I hope you **will** pay more attention to the smaller banks. They can do more if the regulators would only encourage the larger of the **small banks** to support community development lending and investments in smaller communities. Keeping them on the large bank CRA **exam** will do more to encourage reinvestment in the community than letting them take the **small bank** exam does. I'm asking you not to **raise** the asset threshold **definition** of a **small** bank.

I also support the position **of** the National Community Reinvestment Coalition. I think they pretty much nailed it.

Thank you very much for paying attention to my concerns.

Sincerely,


Frank Holst
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