



NATIONAL
HOUSING
TRUST

January 12, 2007

Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552
Re: Docket No. 2006-44

To Whom It May Concern:

The National Housing Trust (NHT) is a national nonprofit organization dedicated to saving existing, affordable housing.

We 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). We strongly support alignment with the three other agencies. The CRA has been vital to building emerging markets nationwide. Lending and equity investing have helped create tens of thousands affordable housing units nationwide. Without the proposed Notice, it is our understanding that lending institutions would be less likely to invest in low income housing tax credits, the principal financial tool used to preserve and improve America's affordable housing stock.

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 urge the OTS to join the other three agencies in their joint rule.

If we can answer any questions or provide additional assistance regarding our comments, please do not hesitate to contact us.

Sincerely,

Michael Bodaken
Executive Director