



January 12, 2007

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

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

Dear Sir or Madam:

Local Initiatives Support Corporation (LISC) is a leading nonprofit investor in low-income community revitalization. Since 1980, LISC has marshaled over \$7 billion from 3,100 private investors, lenders, and donors. In over 300 urban and rural communities nationwide, LISC has helped 2,800 organizations build or rehabilitate more than 200,000 affordable homes and 27 million square feet of retail, community and educational space – totaling \$17 billion in development.

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). CRA is one of America's most important – and successful – community development policies. LISC has worked closely with many banks to fulfill the promise of CRA.

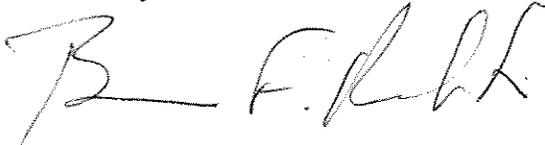
We strongly support OTS's proposed alignment with the three other agencies. Consistency among the regulators helps the communities and insured institutions to maximize these opportunities. It also prevents a regulatory "race to the bottom."

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 ensures

that LMI individuals and communities will 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,

A handwritten signature in black ink, appearing to read "Benson F. Roberts". The signature is fluid and cursive, with a large initial "B" and a distinct "R" at the end.

Benson F. Roberts  
Senior Vice President for  
Policy and Program Development