



January 23, 2007

Office of Thrift Supervision
1700 G Street, NW
Washington, D.C. 20552

Re: Docket No. 2006-44

Dear Sir or Madam:

On behalf of the National Housing Conference (NHC), I appreciate the opportunity to comment on the agency's Notice of Proposed Rulemaking (published on November 24, 2006) that proposes to align the Office of Thrift Supervision's (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).

The National Housing Conference is a nonprofit 501(c) (3) membership association dedicated to advancing affordable housing and community development causes. A membership drawn from every industry segment forms the foundation for NHC's broad, nonpartisan advocacy for national policies and legislation that promote suitable housing in a safe, decent environment across the nation.

NHC supports OTS' proposal to align with the CRA regulations of the other three agencies. The CRA has been vital to building emerging markets nationwide and spurring economic growth in low- and moderate-income communities through lending and equity investing. Consistency among the regulators helps the communities and insured institutions to maximize these opportunities. It also prevents a regulatory "race to the bottom."

We strongly urge the OTS to join the other three agencies in their joint rule expanding the definition of community development. The joint rule issued by the FDIC, the OCC and the Federal Reserve creates an expanded definition of community development and supplies banks with additional flexibility in fulfilling CRA requirements. The unified rules ensure that low- and moderate-income individuals and communities continue to be served by the banks in their community. Two critical components of the joint rule: 1) requires all banks to support their communities through meaningful services, community development loans and investments; and 2) reinforces the fact that some lending practices can count against an institution in a CRA exam. Joining these agencies in this rule is

critical to maintaining OTS' commitment to supporting and servicing underserved communities.

The National Housing Conference is pleased to be able to submit these comments. If further information would be helpful, please feel free to contact me.

Sincerely,

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