

SAMPLE “PUBLIC COMMENT” LETTER

Mr. Matt Jones
Office of the Comptroller of the Currency
5432 S. Main St.
Everytown, NY 12345

Dear Mr. Jones,

I am writing to formally comment on Dollar Bank’s community reinvestment activities (or lack thereof). I received notice that Dollar Bank is undergoing a CRA periodic examination in this quarter and appreciate the opportunity to express some of my concerns. As the Executive Director of Sweet Home Chicago (SHC), a Chicago-based non-profit which serves the needs of the homeless and formerly homeless populations in Chicago, I have had the opportunity to learn about Dollar Bank. Since 1995, SHC has been placing individuals in houses and apartments across the city and since 1999 we have provided “follow-up” classes (including financial education classes) to formerly homeless men and women. Through my work in the financial education area I have come into contact with Dollar Bank and am aware of its poor record in community reinvestments.

For the following reasons, I believe that Dollar Bank deserves a rating of no higher than Needs to Improve:

Services:

In its advertisements, Dollar Bank proudly proclaims, “We Keep *Everyone’s* Dollars.” However, upon closer examination, this statement, though true in theory, is not at all true in practice. Dollar’s basic checking and savings accounts require account holders to maintain a large minimum balance and require a hefty first deposit to initially open an account. These factors combined make it nearly impossible for low and moderate-income individuals to open and maintain either a checking or savings account. As a result, these individuals are more likely to turn to damaging, non-mainstream financial institutions such as currency exchanges and payday lenders.

In addition to its lack of reasonable checking and savings accounts for low- and moderate-income populations, Dollar Bank also falls short when it comes to the locations of their ATMs. Of the 50 ATMs that Dollar Bank maintains, only 2 are in low-income communities and 4 are in moderate-income communities. These are truly miserable statistics. The lack of ATMs requires low-income men and women to go to the bank physically to take care of their banking needs--a process that takes time and often requires an initial outlay of money.

Investments:

Although Dollar Bank has made some improvements with regards to the investment portion of the exam, there is still much room for additional improvement. I am aware of some innovative and complex programs and investments that Dollar has planned, but so far, none of these plans have been implemented. Since the CRA exams focus on *performance* and not plans, it is clear that Dollar Bank still has some way to go before obtaining maximum credit in this portion of the exam. I would urge you to commend Dollar on its creativity and innovation, but reinforce the need to translate plans into concrete action.

Lending:

Although Dollar Bank has not met the needs of the community through services and investments, they have really fallen short in the area of lending. Since this portion of the exam carries more weight than the other two portions, I would urge you to carefully consider their egregious record in the lending area when assigning them a rating. To put in bluntly, Dollar's lending record comes close to redlining. Since its last CRA exam, Dollar has done nothing to remedy its poor lending track record that the OCC highlighted then. While 92% of Dollar's lending occurs in the upper-income portions of their assessment area, 6% of its lending occurs in the moderate-income portions of their assessment area and an abysmal 2% of its lending occurs in the low-income portions of their assessment area. These percentages are even worse than they were 4 years ago at the time of Dollar's last periodic examination. Over the last few years, Dollar has made no effort to economically revitalize the low-income communities in their assessment area. As a result, the majority of applications for small businesses and single-family homes have been denied and these low-income communities have become stagnate.

Clearly, Dollar Bank still has a long way to go before it can claim to truly serve the needs of low- and moderate-income individuals in its assessment area. For the reasons stated above and especially due to Dollar's deteriorating lending record, I urge you to downgrade its rating of "Satisfactory" (given 4 years ago) to "Needs to Improve."

Thank you for the opportunity to submit these comments. Please contact me if you have any questions.

Sincerely,

Jane Doe
Executive Director, Sweet Home Chicago