



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

April 20, 2001

Community Development Investment Letter #2001-1
July 2004
12 CFR 24

Ms. Elizabeth K. Warn
Executive Vice President
First Massachusetts Bank, NA
370 Main Street
Worcester, MA 01608

Dear Ms. Warn:

This communication is in response to your letter of self-certification received on March 5, 2001. First Massachusetts Bank, N.A. (the "Bank") made an equity investment of \$1,000,000 for the purchase of shares in the Access Capital Strategies Community Investment Fund, Inc. (the "Fund"). The Bank self-certifies that its investment in the Fund is consistent with 12 U.S.C. § 24 (Eleventh) (the "statute") and 12 CFR Part 24 (the "regulation") concerning national bank community development corporations, community development projects and other public welfare investments.

The Bank indicates that its investment primarily benefits low- and moderate-income individuals. Specifically, the Bank's investment enables the Fund to make loans to homebuyers with incomes below 80 percent of median income, as well as loans to sponsors of multifamily affordable housing units that utilize federal low income housing tax credits or HUD-insured subsidies. The Fund also invests in HUD-guaranteed securities that support community development in low- and moderate-income areas.

The Bank attests that the investment in the Fund meets the public welfare and other requirements of the regulation and is not subject to prior OCC review. The Bank's investment in the Fund and its aggregate amount of outstanding investments under the regulation do not exceed [] percent of its unimpaired capital and surplus. In no event shall the Bank's aggregate investments exceed 10 percent of its unimpaired capital and surplus

If requested by the OCC, the Bank shall provide reports concerning its investment in the Fund and the Fund's financial status, activities and accomplishments. Copies of all reports submitted to the Office shall also be provided to the Deputy Comptroller, Large Bank Supervision.

If you have questions regarding this letter, please contact Karen Bellesi, Manager, Community Development Investments, at (202) 874-4930.

Sincerely,

signed

Barry R. Wides
Director
Community Development Division

cc: Christopher Bramley, President and Chief Operating Officer, First Massachusetts Bank, N.A.