



April 26, 2007

VIA EMAIL

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, N.W.,
Washington, DC 20052
www.regulations.gov
Docket ID: OTS - 2007-0007

Re: Permissible Activities of Savings and Loan Holding Companies

Dear Sirs and Madams:

The Wisconsin Bankers Association (WBA) is the largest financial institution trade association in Wisconsin, representing approximately 300 state and nationally chartered banks, savings and loan associations, and savings banks located in communities throughout the state. WBA appreciates the opportunity to comment on the Office of Thrift Supervision's (OTS's) proposal to expand the permissible activities of savings and loan holding companies (SLHCs) to the full extent permitted under the Home Owners Loan Act (HOLA). Under HOLA, SLHC's are generally permitted to engage only in activities that are permissible for financial holding companies under the Bank Holding Company Act (BHCA), or activities that are listed in HOLA.

Prior to the enactment of the Gramm-Leach-Bliley Act (GLBA), a SLHC whose subsidiary savings association met the "qualified thrift lender test" was excepted from activities limitations. Since GLBA however, all new SLHC structures are subject to activities limitations. OTS has therefore proposed revision of this limitation to allow all non-grandfathered SLHCs to participate in all permissible activities permitted under HOLA.

WBA supports OTS's proposal to amend its regulations to pre-approve activities authorized under HOLA. These changes would enable SLHCs to engage in activities that the Board of Governors of the Federal Reserve System (FRB) has permitted under any regulation that FRB has promulgated under section 4(c) of the BCHA.

The proposed changes, as well as the proposed approval standards for acquisitions by SLHCs, will provide consistency in procedures and permitted activities for SLHC and BLHCs. Within the proposal, OTS acknowledges it is not aware of any safety and soundness or any other reason why SLHCs should not be permitted to engage in the same businesses permitted BLHCs. WBA agrees with this analysis.

WBA appreciates the opportunity to comment on the proposed permitted activities of SLHC.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Bauer", written over a large, stylized circular flourish.

Kurt R. Bauer
President/CEO

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