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March 25, 2004

Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, N.W.  
Washington, DC 20552  
Attention: No. 2004-06

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Re: Assessments and Fees  
69 FR 6201 (February 10, 2004)

Dear Mr. Katz:

Illinois Mutual Life Insurance Company is pleased to comment on the proposal by the Office of Thrift Supervision ("OTS") to revise the way the agency calculates the assessments and fees for savings and loan holding companies ("SLHC") and savings associations. As the majority shareholder of BankPlus FSB, Illinois Mutual Life is a unitary thrift holding company. Per our contact with the regional OTS office, Illinois Mutual is classified as "low/ non-complex."

Per our approximation, the semi-annual assessment under the proposal for Illinois Mutual would be \$5,500. This includes the basic charge of \$3,000 plus an additional "risk and complexity" assessment of \$2,500 because Illinois Mutual has \$1 billion in assets.

Our records indicate that the examination fee charged to Illinois Mutual has risen from \$960 in 1993 to \$4,875 in 2003 which is in excess of 500% during the ten year period. The proposed assessment represents a \$6,125 or 125% increase. The hourly charge billed in 2003 was noted at \$125. Using the \$145 per hour charge for examiner time noted in the proposal, this increase would be the equivalent of 42 hours or one week of additional examination time annually. Using the annual assessment of \$11,000, the time allocated to Illinois Mutual would be in excess of 75 hours compared to the 39 hours billed in 2003.

While we are willing to support the regulatory process, and believe that each entity should reimburse the OTS for the time and resources allocated to the examination process, we also believe that we should not have to pay more than our appropriate fair share.

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We believe an increase of this magnitude is unwarranted, and respectfully request that the proposal be further reviewed and modified.

Sincerely,

A handwritten signature in black ink, appearing to read "William E. Palmatier". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

William E. Palmatier  
Executive VP and Controller