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Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

Attention: Docket No. **2001-67**

Dear Sir or Madam:

American Savings Bank ("ASB") is a federally chartered thrift in Hawaii with approximately \$6 Billion in assets.

ASB supports OTS' proposal to increase the de minimis investment limitation (Section 560.36). We urge you to consider increasing the limit further to equal the national bank limitation of 5% of capital stock actually paid in and unimpaired and 5% of unimpaired surplus fund.

Due to the uniqueness of Hawaii's inflated real estate market, the 2% of assets limitation contained in HOLA section (5)(c)(3)(A) does not permit many investments. As a result, we must look to section 560.36 (De Minimis Investments) for authority to make additional community development investments, therefore, a higher de minimis limit would allow us to consider more investment options.

Thank you for the opportunity to comment.

Sincerely,

Lori Chiffy
Legal Compliance Manager
American Savings Bank
Honolulu, Hawaii
808-539-7119