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September 7, 2004

Public Information Room
Office of the Comptroller of the Currency
250 E Street, SW
Mailstop 1-5
Washington DC 20219

RE: Docket #04-17

Dear Sir/Madam:

We appreciate the opportunity to comment on the regulatory proposal referenced above, specifically relating to the "Changes Resulting From Revisions to the Board's Regulation C".

The very last paragraph under the above reference item states:
We do not anticipate that loans counted as both "small business/small farm loans" and "home mortgage loans" will be so numerous as to affect the typical institution's CRA rating. In the event that an institution reports a significant number or amount of loans as both home mortgage and small business or farm loans, examiners will consider that overlap in evaluating the institution's performance.

My questions are as follows:

1. How will the examiners know that there has been a significant number or amount being reported?
2. If you do not anticipate many of these loans, why were we required to report in this manner and what purpose is it serving?

An example of a high percentage in double reporting would be farm loans, with real estate as collateral. The real estate is farm land, with a 1-4 dwelling (homestead) included on it. Not many farm loans today are being secured without real estate as collateral.

Please refer back to my original comment letter dated April 19, 2004 (docket #04-05) regarding the double reporting and the false information that will be created, as well has the added burden of re-coding information on our systems for the new reporting requirements.

Feel free to contact me should you have any questions.

Sincerely,

Kathleen A. Humke
Vice President / Compliance