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July 20, 2000

DISSEMINATION BRANCH

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Mr. Robert E. Feldman  
Executive Secretary  
Attn: Comments/OES  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Manager  
Dissemination Branch  
Information Management & Service Division  
Office of Thrift Supervision  
1700 G. Street, NW  
Washington, DC 20552  
Attn: Docket #2000-13

RE: Proposed rule implementing section 711, CRA Sunshine Requirements of the enacted Gramm-Leach-Bliley Act.

Dear Sirs:

This letter comments on the Agencies Proposed Rule on Disclosure and Reporting of CRA-Related Agreements implementing section 711, CRA Sunshine Requirements, of the recently enacted Gramm-Leach-Bliley Act.

I am writing this letter on behalf of First Citizens Bank & Trust Company, a state-chartered bank and Atlantic States Bank, a federal savings association.



### General Comments

1. Limit disclosure only to formal agreements between financial institutions and community organizations that have expressed concerns to agencies regarding the financial institutions CRA program. These formal agreements would be made available to the agencies and copies upon request to the general public.
2. All agreements developed in the ordinary course of doing business that may have a CRA impact, i.e. opening of branches in low-moderate income areas in stores, with consultants, and commercial transactions should be exempt from the GLB Act.
3. The agencies should review the agreements during their normal examination process and note for the record the results of the agreement in lieu of annual reporting.

We appreciate the opportunity to comment on the proposal.

Yours truly,

A handwritten signature in black ink, appearing to read "James L. Mebane", is written over the typed name.

James L. Mebane  
Senior Vice President  
Corporate CRA Officer

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