

From: Ken Wells [Ken.Wells@MASCOMABANK.COM]

Sent: Thursday, January 18, 2007 2:44 PM

To: Comments, Regs

Subject: No. 2006-44

Dear Director Reich,

Community Banks need regulatory relief, not additional regulator burden and the expense that goes with it. Recreating the "Intermediate Small Bank" is yet another example of needless bank regulation.

Imposing a specific Community Development Test will require Intermediate-Small banks to begin collecting records of community service activities of their employees. Additionally, this will set off a flurry of time-hogging seminars, webinars, and retraining.

Also, there is no downside to having different CRA rules for different agencies. I only need to focus on one. We have only had one CRA-related inquiry in three years, and that was by a college student working on a term paper. We are not shopped for CRA against other banks.

I have not read or seen any OTS data identifying a small-bank CRA problem that needs correcting, so this appears to be a solution in search of a problem. With all due respect, it's a bad idea.

Thank you the opportunity to comment.

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