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March 8, 2004

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

Attention: No. 2004-04

Dear Madam or Sir:

As a President of a local community bank I am strongly endorsing the federal bank regulators' proposal to increase the asset size of banks eligible for the small bank streamlined Community Reinvestment Act (CRA) examination from $250 million to $500 million and the elimination of the holding company size limit. This proposal will greatly reduce the regulatory burden that we continually are required to deal with. As a $150 million bank located in Logansport, Indiana we are finding these burdens to be increasingly troublesome.

The small bank CRA examination process is an excellent innovation. This will allow local community banks to focus on what they do best without the requirements of the large bank CRA evaluation process and associated costs. Resources devoted to the current CRA exam process would be more beneficial if devoted to our local community.

Banks should be evaluated against their peers not against banks many times their size. We also feel it is not fair to rate community banks using the same CRA examination used for large banks. We feel that changing the CRA examination process does not relieve banks from their CRA responsibilities. As the survival of many community banks is closely intertwined with the success and viability of their communities the change in process will merely eliminate some of the most burdensome requirements.

In summary I believe changing the CRA examination process is an important step to reducing regulatory burden. I would recommend that banks eligible for the streamlined examination approach be at a targeted level no less than $1 billion in assets. This change

will help eliminate some of the most problematic and burdensome elements of the CRA regulation.

Sincerely,

David G. Wihebrink
President