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March 31, 2004

Dear Sir or Madam:

As a community banker, I strongly endorse the federal bank regulator's 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 elimination of the holding company size limit (currently \$1 billion). This proposal will greatly reduce regulatory burden. I am the Chairman and CEO of The First National Bank, a \$334 million bank located in Artesia, New Mexico, with branches in Roswell, Hobbs, Las Cruces, and Alamogordo, New Mexico.

The small bank CRA examination process was an excellent innovation. As a community banker, I applaud the agencies for recognizing that it is time to expand this critical burden reduction benefit to larger non-community banks. At this critical time for the economy, this will allow more community banks to focus on what they do best – fueling American's local economies. When a bank must comply with the requirements of the large bank CRA evaluation process, the costs and burdens increase dramatically. And the resources devoted to CRA compliance are resources not available for meeting the credit demands of the community. For example, in my bank the compliance officer spends at least 10% of his time on CRA. Then we have five loan processors who spend 10% of their time on the large bank CRA information gathering process. Our IT department spends considerable time upgrading and maintaining the CRA software. Our loan officers spend time documenting community investment activity as well. Overall, we spend approximately \$30,000 each year on large bank CRA compliance.

If our bank were to qualify as a small bank again we would be able to dedicate much more of our time to customer service. The small bank CRA examination would still provide a useful analysis of our CRA compliance and we might possibly be able to service more low and moderate income customers.

Adjusting the asset size limit also more accurately reflects significant changes and consolidation within the banking industry in the last 10 years. To be fair, banks should be evaluated against their peers, not banks hundreds of times their size. The proposed change recognizes that it's not right to assess the CRA performance of a \$500 million bank or a \$1 billion bank with the same exam procedures used for a \$500 billion bank. Large banks now stretch from coast-to-coast with assets in the hundreds of billions of dollars. It is not fair to rate a community bank using the same CRA examination. And, while the proposed increase is a good first step, the size of banks eligible for the small-bank streamlined CRA examination should be increased to \$2 billion, or at a minimum, \$1 billion.

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*The First National Bank**Everett Crawford, Chairman/CEO**Artesia, NM**Page 2*

Ironically, community activists seem oblivious to the costs and burdens. And yet, they object to bank mergers that remove the local bank from the community. This is contradictory. If community groups want to keep the local banks in the community where they have better access to decision-makers, they must recognize that regulatory burdens are strangling smaller institutions and forcing them to consider selling to larger institutions that can better manage the burdens.

Increasing the size of banks eligible for the small-bank streamlined CRA examination does not relieve banks from CRA responsibilities. Since the survival of many community banks is closely intertwined with the success and viability of their communities, the increase will merely eliminate some of the most burdensome requirements.

In summary, I believe that increasing the asset-size of banks eligible for the small bank streamlined CRA examination process is an important first step to reducing regulatory burden. I also support eliminating the separate holding company qualification for the streamlined examination, since it places small community banks that are part of a larger holding company at a disadvantage to their peers. While community banks still must comply with the general requirements of CRA, this change will eliminate some of the most problematic and burdensome elements of the current CRA regulation from community banks that are drowning in regulatory red-tape. I also urge the agencies to seriously consider raising the size of banks eligible for the streamlined examination to \$2 billion or, at least, \$1 billion in assets to better reflect the current demographics of the banking industry.

Sincerely,



Everett Crawford
Chairman/CEO

EC/vt