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March 30, 2004

Communications Division
Public Information Room
Mailstop 1-5
Office of the Comptroller of the Currency
250 E Street, SW
Washington, DC 20219
Docket No: 04-06

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 200551
Re: Docket No. R-1181

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552
Attention: No. 2004-04

Dear Sir or Madam:

The Community Bankers Association of Ohio (CBAO) is Ohio's oldest statewide financial trade association representing Independent Community Bank and Thrift Institutions. CBAO Members serve their communities through 597 locations, with more than 6,000 employees in Ohio. Members collectively hold \$21 Billion in assets, \$17 Billion in insured deposits and \$14 Billion in net loans.

The CBAO supports the proposal that will increase the asset-size of banks eligible for the small bank streamlined Community Reinvestment Act (CRA) examination from \$250 million to \$500 million. The CBAO also supports eliminating the separate holding company qualification for the streamlined examination (currently \$1 billion), since it places small community banks that are part of a larger holding company at a competitive disadvantage.

With these changes Independent Financial Institutions will still comply with the general requirements of CRA but will reduce their costs and burdens dramatically. This reduction will allow more resources to be devoted to meeting the credit demands of their respective communities. Adjusting the asset size limit also more accurately reflects significant changes and consolidation within the banking industry in the last 10 years. The proposed change recognizes that it's does not make sense to assess the CRA performance of a \$500 million bank to the same standards used for an institution many times larger.

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.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert L. Palmer', is written over a horizontal line.

Robert L. Palmer
President and Chief Executive Officer