

60

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

Dear Sir or Madam::

As a community banker, I strongly endorse 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 elimination of the holding company size limit (currently \$1 billion). This proposal will greatly reduce regulatory burden. I am the Vice President and Compliance Officer of Security Bank, a \$220 million bank located in Tulsa, Oklahoma.

The small bank CRA examination process was an excellent innovation. As a longtime community banker I applaud the agencies for recognizing that it is time to expand this critical burden reduction benefit to larger banks. At this critical time for the economy, this will allow more community banks to focus on what they do best-fueling America's local economies. When a bank must comply with the requirements of the large bank CRA evaluation process, the burdens (and costs) increase dramatically.

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 isn't right to assess the CRA performance of a \$500 million bank with 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 at least \$1 billion.

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 the communities, the increase will merely eliminate some of the most burdensome requirements. Regulatory burdens are strangling smaller institutions and forcing them to consider selling to larger institutions that can better manage the burdens.

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 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 considering the size of bank eligible for the streamlined examination to at least \$1 billion in assets to better reflect the current demographics of the banking industry.

Respectfully submitted,

Sharon Ray
Vice President
Security Bank
10727 E. 51st Street
Tulsa, Oklahoma 74146