

**RAYMOND JAMES®**  
FINANCIAL SERVICES, INC.  
Member NASD/SIPC

187

March 25, 2004

Regulation Comments

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

Dear Recipient:

I strongly endorse the federal bank agencies' proposal to increase the asset size of banks eligible for the small institution Community Reinvestment Act examination. It is proposed that the asset size be increased from under \$250 million to under \$500 million. However, I feel that a threshold of \$1 billion would better reflect the current demographics of the banking industry. In an effort to be fair, banks should be evaluated against their peers, not banks hundreds of times their size.

Even though community banks will still comply with the general CRA requirements, implementing this change will eliminate some of the most problematic and burdensome elements of the current CRA regulation from smaller community banks.

Sincerely,



Philip J. Moses, Jr.  
Investment Advisor

**First Federal Financial Services Corporation**

A non-bank subsidiary of First Federal Savings Bank of Florida

Philip J. Moses, Jr., Financial Advisor

798 SW Main Blvd., Lake City, FL 32025

386.755.2260 Fax: 386.752.7051

E-mail: Phillip.Moses@RaymondJames.com