



April 1, 2004

338

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

Attention: No. 2004-04

Dear Sir/Madame:


I am a community banker in a \$100 million dollar bank, and I want to go on record supporting the increase in bank size for the small bank streamlined Community Reinvestment Act (CRA) examination from \$250 million to \$500 million. Actually, this threshold should be raised to \$1 billion.

The reasons for my support are fairly simple. First is the cost in time and money. The "big bank" requirements significantly increase the bureaucratic burden of documenting compliance. This money could be better spent serving the credit needs of our communities. Second is fairness. It is not right or fair to use the same examination procedures for a community bank and a multi-billion dollar bank. This places a disproportionate cost on smaller banks who can least afford it. Third is to best serve the purpose of CRA. Community banks, at least around here, work hard to satisfy the credit needs of our community and, in so doing, comply with the general requirements of CRA. To increase the cost of this compliance in no way improves the compliance or the service to the community; and, in fact, it consumes time and resources that could better be used to serve the credit needs of all areas of our community and further the goals of CRA.

I believe this threshold increase is an important way to keep regulatory burden from increasing as community banks grow. I strongly support your proposal to increase the applicable asset size at this time and hopefully continue to increase it in the future.

Sincerely,

BANK OF LITTLE ROCK


George G. Worthen
President

GGW:cg