

# BridgewaterSavings

411

April 9, 2004

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 President and CEO of Bridgewater Savings Bank, a mutual savings bank with \$270 million in assets located in Raynham, Mass.

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 community banks. At this critical time for the economy, this will allow ore 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 costs and burdens increase dramatically. And the resources devoted to CRA compliance are resources not available for meeting the credit demands of the community.

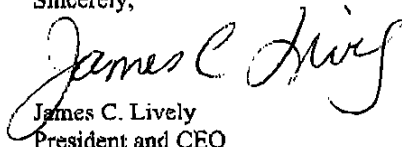
Adjusting the asset size limit also more accurately reflects significant changes and consolidation within the banking industry in the last 10 years. To be fair, banks should be evaluated against their peers, not banks hundreds of time their size. The proposed change recognizes that it's not right to 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 a minimum of \$1 billion.

Ironically, community activists are oblivious to the costs and burdens. And yet, they object to bank mergers that remove the local bank from the community. This is a contradictory. If community groups want to keep the local banks in the community where they have better access to decision-makers, they must recognize what regulatory burdens do to smaller institutions.

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 important to reducing regulatory burden. 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 \$4 billion in assets to better reflect the current demographics of the banking industry.

Sincerely,



James C. Lively  
President and CEO

Administrative Offices  
756 Orchard Street  
Raynham, MA 02767-1028  
(508) 884-3300 • (800) 366-8622  
[www.bridgewatersavings.com](http://www.bridgewatersavings.com)