

**Evans, Sandra E**

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**From:** Tom Wilbur [TWilbur@securitysb.com]  
**Sent:** Thursday, March 18, 2004 7:30 PM  
**To:** regs.comments@ots.treas.gov  
**Subject:** CRA Comment

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To whom it may concern:

As President of Security Savings Bank, a federal thrift institution with nine full-service branch offices across the State of Kansas, I feel it's important to comment upon the proposed CRA changes the bank regulatory agencies are presently considering-- primarily, that of raising the threshold on small bank regulations and examinations from the current level of \$250 MM in assets to \$500 MM in assets.

About the time I came to Security Savings Bank eight years ago, we had just over \$200 million in assets-- and today we are rapidly approaching \$800 million in assets. We are doing substantially the same things now-- in meeting the needs of low and moderate income people, small businesses and farms, first time home buyers, outreach programs in banking, education, investments, and support for people from all walks of life than we were then. We are successful as a business and as a bank because of our commitment to serving all people. Sure, we are bigger now and we have the capacity to do more because of our size-- which we do-- but we willingly work hard to meet the provisions of the Community Reinvestment Act, for a number of reasons:

- 1) It's the right thing to do. Investment in the communities we serve make for better communities, and with a higher quality of life surrounding our families, employees, neighbors, friends, and fellow citizenry-- and improvements come with the effort.
- 2) By being a good partner with all we encounter, and with better outreach programs, we are a better bank, and we gain more business because of our work. Diversity is a strength, and we prove it with what we do-- every single day.
- 3) We follow the rules, because are asked to comply with the provisions of the Community Reinvestment Act in meeting the needs of those assessment areas we serve. As a community bank, it's not a challenge-- following regulations is simply part of being a safe and sound bank.

Here's my point--- whether we are evaluated as a small bank, or a large bank-- CRA applies to us all of us in the banking industry. The key element under consideration is the burden of record-keeping placed upon smaller banks and the additional costs associated with compliance with the reporting and self-evaluation that must take place under larger bank rules. I can certainly sympathize with smaller banks, as I do with large banks, which:

- 1) Are being asked to do more and more in combating America's drug trafficking and money laundering issues
- 2) Are being asked to do more and more in evaluating accounts to ensure protection from new threats in terrorism
- 3) Are being regulated with more detailed reporting requirements in nearly every phase of our banking operations
- 4) Are being asked to be more compliant, and at a higher level, with identity fraud and systems confidentiality, and
- 5) Are being more closely scrutinized on corporate governance and integrity in management issues.

If we don't comply with CRA, we're not going to be a very good bank. Neither will competitors of ours. But the vast majority of banks across

this great nation do a tremendous job in serving low and moderate income persons-- with programs the likes of which were unimaginable 20 years ago. The grading and testing you do every day as you test banks in this area of CRA supports that statement.

Most banks today offer free accounts of some sort, or lifeline accounts for those with simple transactional needs. Most banks have vigorous commitments to lending money-- to persons from all walks of life and all backgrounds with a strong emphasis on low and moderate income persons. Making good loans is inherently what we must do to generate income. Most banks also have numerous outreach programs-- many in very dynamic ways-- and they are to be commended for all they do investing and serving the financial needs in thousands of communities.

Our organization has a branch banking office inside the world's largest beef processing plant-- a plant that is employer to over 3,000 wonderful people in Southwest Kansas. Most of those (employed in the process of slaughtering and processing beef) come from immigrant populations of Hispanic and Asian descent---many of whom don't speak English. I can tell you that our programs and our employees who serve them don't come from the desire to satisfy a regulation. These programs come from the fulfillment of a need-- and a desire on our part to help people-- people with whom we want to be better partners -- with their families, their small businesses, and in their homes. They are our valued customers, and we love them. The commitment to this level of diversity makes us a better bank. And the people whose lives we touch, have a better understanding of matters financial-- even on things as simple as learning how to write a check.

Our institution has nothing to gain by my writing this comment-- we are already a "big" bank-- and would be considered a "big" bank if you decide to raise the level to \$500 million in assets-- which I support. In my opinion, if we continue to focus upon the reasons on why CRA and similar efforts work for all of us, instead of spending so many of our resources chasing, scrutinizing, and regulating the efforts-- the assessment areas we identify, and the people we are trying to help-- will be better served.

I support the proposal to raise the threshold. Thanks for the opportunity to comment.

God bless each of you for your service to our industry. And thanks to all who take time to comment on these issues-- your input is valuable and of service to everyone.

Respectfully,

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