



March 22, 2004

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

Re: Community Reinvestment Act Regulations

Dear Sir or Madam:

As a community bank, we 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.

The small bank CRA examination process was an excellent innovation. As a community bank, we 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 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 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 times 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 \$2 billion, or at a minimum, \$1 billion.

Ironically, community activists seem oblivious to the costs and burdens. And yet, they object to bank mergers that remove the local bank from the community. This is contradictory. If community groups want to keep the local banks in the community where they have better access to decision-makers, they must recognize that regulatory burdens are strangling smaller institutions and forcing them to consider selling to larger institutions that can better manage the burdens.

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, we 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. We 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 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. We also urge the agencies to seriously consider raising the size of banks eligible for the streamlined examination to \$2 billion or, at least, \$1 billion in assets to better reflect the current demographics of the banking industry.

Sincerely,

Please see the attached list

Chuck Thieme
3545 Richie Rd
Verona, WI 53593

cat

Robin O. Roberts
5909 Red Oak Trail
Mc Farland, WI 53558

Rob O. Roberts

Rich Cooper
6852 Moonstone Ct.
DeForest, WI 53532

Rich Cooper

Michelle Acker
5228 Scenic Ridge Trl.
Middleton, WI 53562

Michelle Acker

Mike Petta
1218 Loruth Terrace
Madison, WI 53711

Mike Petta

Tammy Annen
424 Washington Street
Sauk City, WI 53583

Tammy Annen

Carol Maki
7131 Hickory Run
Waunakee, WI 53597

Carol Maki

Katie Bauch
908 Arden Ln.
Madison, WI 53711

Katie Bauch

Karla Homan
507 Seventh St.
Waunakee, WI 53597

Karla D Homan

Dede Birrenkott
8503 Airport Road
Middleton, WI 53562

Dede Birrenkott

Gary Kuter
2015 Sylvia Pine Way
Cross Plains, WI 53528

Gary Kuter

Greg Block
725 Deer Holt
Madison, WI 53711

Greg Block

Amy Gile-Enge
602 Worthington Way
Waunakee, WI 53597

Amy Gile-Enge

Tricia Clason
415 N. Main Street
Fall River, WI 53932

Tricia Clason

Judy Kelter-Ketelboeter
2611 Church St.
Cross Plains, WI 53528

Judy Kelter-Ketelboeter

Greg Dorn
927 Hemlock Dr.
Verona, WI 53593

Greg Dorn

George Gjermundson
107 Ski Ct.
Madison, WI 53713

George Gjermundson

Stan Erlandson
N3951 Brown Deer Dr.
Broadhead, WI 53520

Stan Erlandson

Doug Adler
100 S. Division Street Apt #104
Waunakee, WI 53597

Douglas J. Adler

Leslie Griffith
7334 W. Valley Ridge
Madison, WI 53719

Leslie Griffith

Kari Hellenbrand
7615 Rauls Rd.
Dane, WI 53529

Kari Hellenbrand

Stephanie Haag
305 Santa Maria Drive
Arlington, WI 53911

Stephanie Haag

Corrin Maier
5116 Pheasant Branch Rd
Waunakee, WI 53597

Corrin Maier

Sharen Hook
1979 Oak Wood View Dr.
Verona, WI 53593

Sharen Hook

Carmen Renneker
303 Edgemere Court
Waunakee, WI 53597

Carmen Renneker

Andrew Julian
535 W Johnson St Apt #907
Madison, WI 53703

Andrew

Julia

Ty Shea
7409 Timber Lake Trail #306
Madison, WI 53719

Ty Shea

Janel Karls
817 N. Madison St.
Waunakee, WI 53597

Janel Karls

Brenda Zander
2903 Northbrook Drive
Middleton, WI 53562

Brenda Zander

Joan Kazel
4903 Shore Acres Rd
Monona, WI 53716

Joan Kazel

Susan Ziegler
6501 Elmwood Avenue
Middleton, WI 53562

Susan Ziegler

Carmen Kruschek
109 Simon Crestway
Waunakee, WI 53597

Carmen Kruschek

Carl Boehmke
6528 Hubbard Ave
Middleton, WI 53562

Carl Boehmke

Lollie Larson
5514 Englewood Dr.
Madison, WI 53705

Lollie Larson

Kris McDermott
6100 Scotch Pine Way
Madison, WI 53719

Kris McDermott

Marilyn Meffert
6471 Schumacher Rd
Waunakee, WI 53597

Marilyn Meffert

Amanda Needham
8006 Hwy K.
Cross Plains, WI 53528

Amanda Needham

Ericka Peters
204A Columbus Street
Lodi, WI 53555

Ericka Peters