



**FIRST FEDERAL  
SAVINGS BANK OF FLORIDA**

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March 24, 2004

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

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Dear OTS:

As a community banker, 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,

Keith C. Leibfried  
President & CEO

KCL/srs