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1722 EYE STREET, N.W.  
WASHINGTON, D.C. 20006  
TELEPHONE 202 736 8000  
FACSIMILE 202 736 8711

HONG KONG  
LONDON  
SHANGHAI  
SINGAPORE  
TOKYO

FOUNDED 1866

November 21, 2000

*By Hand*

Manager  
Dissemination Branch  
Information Management and Services Division  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552

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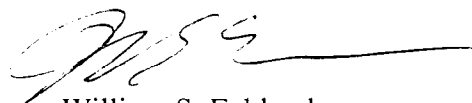
Re: Notice of Proposed Rulemaking: Savings and Loan Holding Companies  
Notice of Significant Transactions or Activities and OTS Review of  
Capital Adequacy

Gentlemen and Ladies:

This letter is written on behalf of several of our savings and loan holding company clients that could be subject to the Notice of Proposed Rulemaking: Savings and Loan Holding Companies Notice of Significant Transactions or Activities and OTS Review of Capital Adequacy, which was published in the *Federal Register* on October 27, 2000 at 65 *Fed. Reg.* 64392 (the "Notice"). The Notice proposes a significant change in OTS policy governing the regulation of savings and loan holding companies, and entities that could be subject to this regulation should be afforded ample opportunity to provide the agency with meaningful comments with respect to the Notice. These clients wish to comment on the proposal, either individually and/or together as a group. Compliance with the current comment deadline of December 26, 2000 would require a significant dedication of resources in the midst of the affected-companies' year-end activities.

Given the significant proposed change in agency policy, we request that the comment period be extended for at least 60 days to provide an appropriate period of time to provide the agency with comments about the Notice and the proposed requirements therein.

Sincerely,

  
William S. Eckland