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# Camco Financial Corporation

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February 6, 2001

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REGULATION SERVICES  
DIVISION

Manager, Dissemination Branch  
Office of Thrift Supervision  
Information Manager & Services Division  
1700 G Street, N.W.  
Attention: Docket No. 2000-91  
Washington, DC 20552

**Re: Savings & Loan Holding Companies Notice of Significant Transactions or  
Activities and OTS Review of Capital Adequacy  
65 Fed. Reg. 64392 [October 27, 2000]**

Dear Sir or Madam:

Camco Financial Corporation, a multiple Savings & Loan Holding Company, wishes to comment against the proposed regulations issued by the Office of Thrift Supervision [OTS] which calls for advance notice before engaging in, or committing to engage in, significant debt or asset acquisition transactions and/or transactions that significantly reduce the capital ratio.

Camco Financial has an impeccable 30-year record as a consolidator in the thrift industry having successfully completing seven acquisitions without a single critical OTS comment or question.

Advance notice regarding debt and/or asset acquisition would delay future Camco acquisitions, would add cost and uncertainty and would likely kill many of the deals Camco contemplates going forward.

Camco also objects to the notice of defined capital standards and the implied "source of strength" doctrine.

We urge the OTS to withdraw this proposal in it's entirety.

Should the OTS seek industry input to address a specific regulatory concern Camco Financial would be pleased to be of assistance if invited to do so.

Sincerely,

Larry A. Caldwell,  
Chair

LAC/alf