

**HEARTLAND
COMMUNITY
BANKERS
ASSOCIATION**

OFFICE OF THRIFT SUPERVISION
DISSEMINATION BRANCH
2000 DEC -4 P 3: 51

James R. Turner, President

700 S. Kansas Ave., Suite 512
Topeka, Kansas 66603
(785) 232-8215

November 30, 2000

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

Attention: Docket No. 2000-91

Dear Sir or Madam:

The Heartland Community Bankers Association (HCBA) appreciates the opportunity to comment on OTS proposed rulemaking pertaining to Savings and Loan Holding Companies notice of significant transactions or activities and OTS review of capital adequacy. HCBA represents thrift institutions in the states of Colorado, Kansas, Nebraska, and Oklahoma...a significant portion of which are organized under a holding company structure.

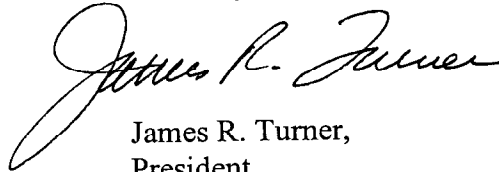
The proposal would impose a thirty-day notice to OTS by most savings and loan holding companies prior to significantly increasing their debt, substantially reducing capital, or making acquisitions that exceed 15% of assets. Further, we've been led to believe that the proposal is a result of risk concerns relating primarily to existing unitary holding companies. If this is true, would it not be better to focus regulatory attention on this group rather than a broad brush approach that impacts all thrift holding companies?

We share the concern of those who feel the proposal is too broad in scope and does not fully recognize that market conditions... particularly in dealing with capital markets...will not wait 30 days. Further, the potential market disruption of extending the proposal to GSE's, particularly FHLBank borrowings, is totally unnecessary. Is this level of regulatory oversight necessary?

We do not quarrel with the commitment of OTS to the safety and soundness of the thrift industry. Indeed, we applaud the continued attention and review. If OTS does not have investigative authority in place to consider these issues, then perhaps appropriate rules are necessary. However, such a proposal should have a more narrow focus on the relationship between the parent company and their thrift.

It is the suggestion of HCBA that the proposed regulation be withdrawn and, if necessary, be reissued for comment on a more focused basis. Thank you for this opportunity to comment.

Sincerely,



James R. Turner,
President

JRT/da