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AMERICAN BANKERS ASSOCIATION

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OFFICE OF THRIFT SUPERVISION  
DISSEMINATION BRANCH

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December 1, 2000

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

RE: Savings and 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:

After a careful review of the proposed rulemaking and on behalf of our savings association members, the American Bankers Association respectfully requests an extension of the comment period for the above-cited proposal issued by the Office of Thrift Supervision. ABA brings together all categories of banking institutions to best represent the interests of the rapidly changing industry. Its membership – which includes community, regional and money center banks and holding companies, as well as savings associations, trust companies and savings banks – makes ABA the largest banking trade association in the country.

The issues presented by the proposal are complex and relate differently to diversified holding companies than the standard holding companies where the institution is the major asset. The proposal is also only one piece of a more sophisticated agency approach to holding companies. More time is necessary to fully appreciate the breadth and ramifications of the proposal.

Consequently, we respectfully request that the comment period be extended for at least 60 days to give the industry time to explore issues more fully and provide meaningful comment. Your consideration of this request is appreciated. If you have any questions, please do not hesitate to contact me.

Sincerely,

Dawn Causey