

JAMES H. CLAYTON President & CEO



October 16, 2001

Regulations Comments Chief Counsel's Office Office of Thrift Supervision 1700 G Street, NW Washington, DC 20552

Dear Sirs:

I am writing to urge you to raise the asset-size for small bank CRA exams to more than \$250 million. Our bank has grown to \$350 million in asset size but we're still a rural community bank operating in nine different Mississippi Delta Communities.

We haven't had a CRA exam since we reached the higher asset level but our compliance officer has already made me aware of the increased workload. This includes additional expense and paperwork related to the large bank exam. We also have concern about the investment test and the types of investments that qualify for CRA credit. We just don't have the expertise needed to make sound decisions in this area.

We would certainly appreciate your consideration in raising this limit. We're very involved in the communities we serve and the excessive burden of the large bank exam is detrimental to our community bank.

212 Catchings

Sincerely,

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