

10/15/2001

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Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington DC 20552
Attn: Docket No 2001-49

As a small community bank with assets of \$80 million, located 40 miles from a large metropolitan area, we feel that the cut off size for a CRA exam should be set at a minimum of \$250 million.

Small community banks such as ours must lend money to its own community to survive in today's market. With interstate banking and the merger activity continuing, it is not fair to assess banks our size for the same standards as used for the megabanks.

Small community banks should not be expected to collect and report data on small business and small farm loans. It seems that a small state chartered bank is being examined all the time by one regulating body or another. We should be trying to do away with more paperwork instead of creating it. Additional paperwork means more overall cost. In today's market with the shrinking margins, it is necessary to continue to look at areas of cost savings.

When you consider the census tracts we are currently in, it is very difficult to designate low- and moderate income within that area. In many of census tracts there no difference in the low or moderate income category.

We hope that when you make your final decisions that you keep the small independent bank in mind. There is still a place in this country for a bank like ours, but we need your help to keep it that way.

Sincerely,

Paul O. Olm
Comptroller
Wisconsin State Bank