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December 2, 2004

VIA FIRST CLASS MAIL

Regulation Comments (Attn.: No. 2004-54)
Chief Counsel's Office
Office of Thrift Supervision
1700 G St., N. W.
Washington, DC 20552

Gentlemen and Ladies:

**Subject: Office of Thrift Supervision; RIN 1550-AB93; EGRPRA
Regulatory Review - Application and Reporting
Requirements**

Thank you for this opportunity to comment on the above-captioned requirements. The management of this bank appreciates the efforts of the OTS in this endeavor.

- I. Elimination of application and notice requirements for re-designations of home and branch offices

The management of this bank supports this change.

- II. Elimination of application and notice requirements for certain highly rated federal savings associations

The management of this bank supports this change. Also, management sees your call for comments regarding "a specified limit" or "multiple branch expansion"; however, it's difficult to comment without more details.

- III. Elimination of notice requirement for short-distance relocations

The management of this bank supports this change.

- IV. National Historic Preservation Act and National Environmental Policy Act

The management of this bank wants more guidance. For example, OTS Applications Handbook pg. 100.8 says that ". . . the institution should provide a statement on the impact of the proposal on human environment, including information on changes in air and/or water quality, noise levels" However, management is not aware of any safe harbor standards. That is, what is too loud? What is congestion? Is it sufficient to reply with "none" or "N/A"? Management would like benchmarks so self-assessments will be meaningful.

Also, is there a minimum amount of due diligence that will provide a safe harbor? Can an institution rely on its proposed landlord? Must it hire consultants and commission a report? Must it retain a lawyer and request an opinion letter?

V. Relocation; consultation with appropriate regional office

No. 2004-54, pg. 12, says that ". . . OTS will encourage all federal savings associations to consult with their appropriate regional office before they open or relocate any office for which a branch application or notice is not required." While the management of this bank certainly supports an open dialog with its regional office, this strikes as being counterintuitive. What happens if an association initiates the consultation, but its regional office disagrees with the relocation? Can that association finalize the relocation as this was merely a "consultation"?

VI. Application processing

The management of this bank supports this change.

VII. Nondiscriminatory advertising

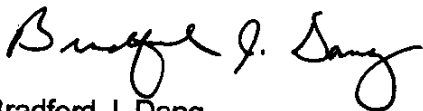
The management of this bank supports this change; in addition, it would like a definition of "advertisements."

VIII. Reports of change in chief executive officer or director

The management of this bank supports this change.

I appreciate your kind attention.

Respectfully,



Bradford J. Dang
Assistant Vice President and Associate Counsel