



# TIME FEDERAL SAVINGS BANK

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January 24, 2005

Regulation Comments, Chief Counsel's Office  
Office of Thrift Supervision  
1700 G. Street N.W.  
Washington, D.C. 20552

Attention: No. 2004-53

Re: Community Reinvestment Act-Community Development, Assigned Ratings  
69 FR 68257 (November 24, 2004)

Dear Sir or Madam:

As an officer of a 425 million dollar savings bank in north central Wisconsin I applaud OTS's decision to raise the small institution CRA limit to one billion or less. Had they waited for input from community groups they would still be debating the issue like the FDIC and OCC. Our Primary function is home loans, and finding items for the investment test were difficult or non-existent in our market area or even the entire state. I would urge the other bank regulators to follow the lead of OTS and raise the small institution CRA limit to one billion.

Institutions, both large and small, should be allowed to decide where their time, money and efforts are best spent in the community. Washington fails to realize that if we don't serve the customer that pretty soon we won't have any customers. Most banks do a good job at meeting the credit needs of their community without a government mandate. Too much of our time is spent on HMDA and compliance issues. We should not be required to complete a 40 page quarterly report when we have an annual safety and soundness exam. The paper work burden needs to be reduced for smaller institutions to survive or there will be fewer and fewer options for customers. Fewer options mean higher interest rates, higher finance charges and most likely poorer service.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick L. Pleus". The signature is fluid and cursive, with a large initial "P" and "L".

Patrick L. Pleus  
Senior Vice President

PLP:ll

**Convenient One Stop Banking**