

# FIRST NATIONAL BANK ★U★S★A★

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BRANDT J. DUFRENE  
CHAIRMAN OF THE BOARD  
PRESIDENT AND CEO

RECEIVED  
2001 FEB 26 P 4: 05  
INFORMATION SERVICES  
DIVISION

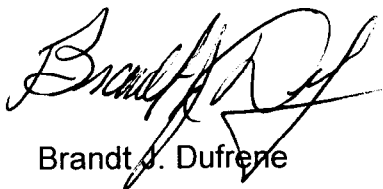
February 22, 2001

Manager, Dissemination Branch  
Information Management & Services Division  
Attn: Docket No. 2000-90  
Office of Thrift Supervision  
1700 G Street NW  
Washington, DC 20552

Dear Sir:

Risk-based capital for non-complex small banks (under one billion) would best be calculated using the second proposed option. The most meaningful calculation would be to use the leverage ratio only.

Sincerely,



Brandt J. Dufrene

BJD/lp

