COMMUNITY BANKERS ASSOCIATION OF NEW YORK STATE
655 THIRD AVENUE, NEW YORK, NY 10017 • TEL: 212-573-5500 • FAX: 212-573-5509

543

September 13, 2004

FDIC RECEIVED
2004 SEP 20 P 2:47
THE OFFICE OF
EXECUTIVE SECRETARY

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

RE: RIN number 3064-AC50

Dear Sir/Madam:

The Community Bankers Association of New York State* strongly urges the FDIC to raise the threshold for the streamlined examination process to $1 billion. Increasing the asset amount would not have a significant impact on CRA activities in our communities. It would, however, provide regulatory relief for many institutions at a time when compliance with other major national priorities is placing increasing regulatory burdens on smaller institutions.

The FDIC's proposal to add a mandatory community development performance criterion as an additional component provides a rational balance for smaller institutions. Under this proposal, banks can adapt their lending, investing, and service activities to the opportunities in their own assessment area as well as to the bank's own strengths. An institution can engage in one or more, as opposed to all, of the activities.

We applaud the FDIC's initiative in this area and encourage your action on this proposal.

Sincerely,

Mariel Donath

Mariel Donath

*. The Community Bankers Association of New York State (CBANYS) is a full-service trade association representing savings institutions and commercial banks with cumulative assets exceeding $170 billion, employing approximately 23,000 New Yorkers at 1,265 locations statewide, and allocating more than $1 billion annually toward local affordable housing and community development.