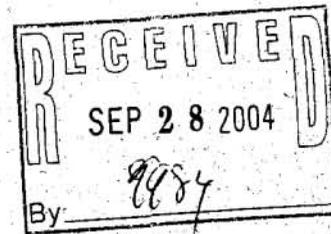




**Laconia**  
**Savings Bank**



September 21, 2004

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

Re: Community Reinvestment, Act, RIN number 3064-AC50  
Proposal to Expand Eligibility for the Streamlined CRA Exam

Dear Mr. Feldman:

Laconia Savings Bank is the largest independent bank in NH with assets totaling \$800 million. Our census tracts are largely rural in nature. We strongly support the FDIC's proposal to increase the asset size limit of banks eligible for the small-bank streamlined CRA examination.

Laconia Savings Bank (LSB) is strongly committed to reinvesting in the communities where it does business. LSB recognizes that Community Reinvestment is good business and the change to the streamlined examination would not affect the bank's commitment to serve low-moderate income individuals and to provide products and services for all individuals in our assessment areas. The bank is very involved in low-income housing and community economic development. The streamlined evaluation would not change the way LSB conducts business. Evaluating a \$250 million up to \$1 billion dollar bank using the same procedures as for a multi-billion dollar bank is not realistic and the proposal will lead the way to a more equitable evaluation.

Qualified Investments are often hard to obtain in northern and central NH. These investments often benefit other areas of the state or region with very few falling within the bank's assessment areas. Additionally, larger banks often take the few qualified investments that become available. Freeing up funds to invest directly in local communities would make more of an impact on the communities where we do business. We support the FDIC's proposed community development requirement for banks between \$250 million and \$1 billion.

Your consideration of our comments is greatly appreciated.

Very truly yours,

Marilyn A. Spearman, Vice President-  
Community Development Officer

Cc: Linda D. Normandin, Senior Executive Vice President & Chief Operating Officer  
Robert E. Curtis, Executive Vice President & Chief Risk Officer  
File

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