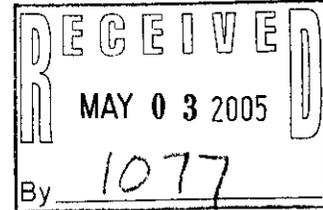




**Guiding Light
Resources, LLC**



Ronald G. Gauvin
Compliance Consultant
Witness Closing

9 Mason Avenue
Hooksett, New Hampshire
03106-2425

April 25, 2005

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

Re: RIN Number 3064-AC50

To Whom It May Concern:

It is common knowledge nationwide that the de facto definition of a "small bank" is now \$1 billion in assets or less. It is also common knowledge that community banks across the country are being crushed by the huge regulatory burden that has been placed on the banking industry in general. Raising the threshold for the streamlined small bank CRA examination to \$1 billion without regard to the size of the bank's holding company would greatly reduce this regulatory burden.

As a retired Compliance FOS, with 27 years with the Corporation, in Compliance since 1978, and currently a Consumer Compliance Bank Consultant, I support the addition of a Community Development criterion to the small bank CRA test, but only if it is applied to banks between \$500 million to \$1 billion. Adding the new CD criterion to banks below \$500 million in assets would increase the regulatory burden of extremely small institutions and be counterproductive. I also believe that a new Community Development criterion should be part of the test to evaluate an institution's overall performance in meeting the needs of its community and not a stand-alone test.

In addition, I strongly support the FDIC's proposal to change the definition of "community development" to include rural residents as well as people who live in low- and moderate-income areas. Two-thirds of Northern New England lies in a rural region. Modifying this definition would truly allow many small institutions to accurately reflect their efforts to lend into the market areas where they collect deposits. After all, that's what CRA is all about.

Sincerely,

Ronald G. Gauvin
Compliance Consultant

Home: 603 485-8691

Cell: 603 620-3025

Fax 603 485-8691

Email - gauvin4k@comcast.net