WISCONSIN BANKERS ASSOCIATION

January 9, 2006

VIA EMAIL
Mr. Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
comments@fdic.gov
RIN Number: 3064-AC97

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
regs.comments@federalreserve.gov
Docket No. OP-1240

Office of the Comptroller of the Currency
250 E Street, SW, Mail Stop 1-5
Washington, DC 20219
regs.comment@occ.treas.gov
Docket No. 05-17

RE: Proposed Community Reinvestment Questions and Answers

Dear Ladies and Gentlemen:

The Wisconsin Bankers Association (WBA) is the largest financial institution trade association in Wisconsin, representing approximately 300 state and nationally chartered banks, savings and loan associations, and savings banks located in communities throughout the state. WBA largely supports the efforts of the Office of the Comptroller of the Currency, Board of Governors of the Federal Reserve System, and Federal Deposit Insurance Corporation (collectively, the Agencies) to revise and update the Interagency Questions and Answers Regarding Community Reinvestment Act (CRA). WBA previously submitted comments on the CRA regulations proposed over the last several years, and once again appreciates this additional opportunity to submit the following comments for the Agencies' consideration.

In connection with a proposed question regarding the definition of a "designated disaster area", the Agencies suggest the incorporation of a one year "lag period" during

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which a bank may continue to receive consideration for activities in a disaster area for which the Federal or state disaster declaration has expired. The Agencies seek comment on whether a lag period is needed and, if so, what the appropriate time frame should be.

WBA strongly supports the adoption of a lag period; however, the lag period should extend to at least five years beyond the expiration of the disaster declaration rather than merely one year. WBA believes that one year is wholly insufficient to assist communities stricken by disaster to recover from the devastation caused by such events. For instance, in the last six months this country was hit by one of the largest hurricanes in history. The U.S. government acknowledges it will be numerous years before the effected areas will fully recover.

While the State of Wisconsin has not experienced a disaster on the magnitude of Hurricane Katrina, the small community of Ladysmith, Wisconsin (and surrounding area) was undeniably devastated by a series of tornados during the summer of 2002. This area was declared a disaster but even today, over three and one-half years since the disaster, the area has not fully recovered. This further underscores the length of time it takes for a disaster-stricken area to redevelop and regain stability.

As is always the case in these disaster recovery efforts, banks play a key and ongoing role to facilitate community redevelopment and stability. WBA believes that these efforts are crucial and should absolutely be considered community development activities for not just one year but for at least five years beyond the expiration of the disaster declaration.

Once again, WBA appreciates the opportunity to submit comments on the proposed CRA Questions and Answers.

Sincerely,

Kurt R. Bauer
President/CEO