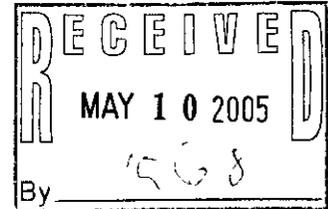




COMMUNITY REINVESTMENT ASSOCIATION  
of NORTH CAROLINA



May 4, 2005

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17th St. NW, Washington DC 20429

RE: RIN 3064-AC89

Dear Sirs:

I am deeply concerned that intermediate small banks would no longer be required to report data on small business lending and small farm lending. It was estimated by the Federal Reserve that institutions between \$250 million and \$1 billion in assets made roughly 20 percent of the total dollar volume of all small business loans and 43 percent of the total dollar volume of all small farm loans in 2003. In communities with a disproportionate number of intermediate small banks, these percentages are substantially higher. Also, if large, credit-card lenders are removed from the data-set, the proportion of traditional non-credit-card bank loans made by these banks would almost certainly be substantially larger.

These intermediate small banks are precisely the types of institutions that are big enough to handle the more sophisticated needs of small businesses (versus homeowners, e.g.) yet small enough to remain committed to the sort of relationship lending that small firms in lower-income areas depend on.

To lose data on these loans would severely harm the quality of that data set and make it increasingly difficult for (your organization), banking regulators, researchers, and the public to accurately evaluate the small business and farm lending performance of both intermediate small banks and large institutions in the context of the overall small business lending market.

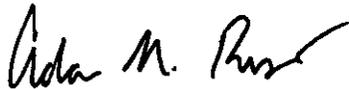
As the Research Director for a statewide nonprofit, I regularly rely upon small business and farm lending data in my work. Our organization engages banks in their service to their local community. With loan data and the corresponding demographic and geographic data appended

to the loan files, our organization can track the extent to which a bank reaches out to all members of a community.

While this is not the only source of data that we rely upon, we would greatly miss it if it were eliminated. The availability of this data informs our organization. It puts us on a level playing field.

I ask that you continue to require intermediate small banks to report this data.

Sincerely,

A handwritten signature in black ink that reads "Adam M. Rust". The signature is written in a cursive, slightly slanted style.

Adam Rust  
Research Director