

From: David Kreiman [mailto:DKreiman@gsb.com]
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To: Comments
Subject: RIN No. 3064-AC89 - CRA Regulations.

I am certainly in favor of eliminating the loan data collection and reporting requirements. I believe that the definition of an "intermediate small bank" should be expanded to \$250 million - \$2 billion.

I am opposed to the elimination of the service test, as I feel that is as important as the lending and investment components.

I would like to see local community donations (which currently do not count as a "qualified investment") be viewed as valuable as an impersonal investment in a CRA-qualified fund - perhaps judging what % of assets a bank uses as straight donations to organizations who help low-moderate individuals within the assessment area.

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