

-----Original Message-----

From: Muell, Donald [<mailto:dmuell@scsbnet.com>]

Sent: Tuesday, March 15, 2005 9:17 AM

To: Comments

Subject: RIN No. 3064-AC89 - CRA Regulations.

To Whom It May Concern:

I work in a community bank in Western Iowa. We are about \$ 200 million in size and serve a wide variety of customers. As a result of our affiliation with a larger holding company bank, we have been subject to Large Bank CRA for the past two years. Please allow me to share some of the burdens this places on our bank.

First and foremost , it requires over 75% of a senior loan support specialist's time. This is time that could be better utilized directly helping customers who come to our bank, or providing regular lending support to our team of lenders. Secondly, it requires the time and effort of every loan officer who must take all the extra documentation steps to carefully fulfill the requirements of Large Bank CRA. Finally, all the time we spend to diligently collect this data serves no one. The vast majority of the data we collect is similar to the area we serve. We serve no metro areas, only a rural Iowa county, that is more similar than different.

Thank you for the opportunity to make comment on this proposed change. By making this change, you will do a great favor for us and in turn, our bank customers.

Sincerely,

Donald P Muell
Vice President
Shelby County State Bank
111 Main Street
Portsmouth, Iowa 51565

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