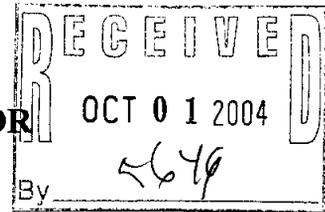




STATE OF ILLINOIS
OFFICE OF THE LIEUTENANT GOVERNOR
SPRINGFIELD, ILLINOIS 62706



PAT QUINN
LIEUTENANT GOVERNOR
September 22, 2004

Mr. Robert Feldman
Executive Secretary, Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429

Re: RIN#3064-AC50

Dear Mr. Feldman,

As Illinois Lieutenant Governor and former State Treasurer, I urge the Federal Deposit Insurance Corporation (FDIC) to reject proposed changes to the Community Reinvestment Act (CRA). The adoption of these proposals can lead to a serious decline in investment in low and moderate-income areas as well as the many rural communities in Illinois.

The Federal Deposit Insurance Corporation is currently considering changing the definition of "small banks" to include those with less than \$500 million in assets in the bank and/or any related holding companies. The "small banks" are subject to streamlined CRA examinations that do not examine the distribution of bank services or levels of community development-related investments. Communities throughout Illinois rely on such investments.

Adoption of the proposed rules will lead to the reduction in the number of "large banks" by 63%. Nearly \$3.4 billion in low and moderate-income investments could shift from "large" to "small" banks.

The proposed CRA change will have dramatic and negative effects on rural Illinois. "Large banks" following the change will operate only one percent of FDIC regulated banking offices.

The Federal Reserve and Office of the Comptroller announced that they are keeping existing thresholds for the determination of "small banks". I urge the Federal Deposit Insurance Corporation to similarly reject the proposal.

Sincerely,

A handwritten signature in black ink that reads "Pat Quinn".

Pat Quinn