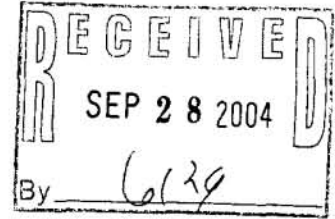


ABINGTON BANK

since 1867



September 17, 2004

Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 29429

RE: Community Reinvestment
RIN number 3064-AC50

Dear Mr. Feldman:

The Board of Trustees of Abington Bank has asked me inform you of our support for the proposal issued by the FDIC that would amend the definition of a small institution for the purposes of the Community Reinvestment Act to an institution that is under One Billion Dollars in assets. Abington Bank was established in 1867 by members of the local community and it has continued to serve this community ever since. Documenting its compliance with rules and the intent of CRA has become an increasing burden as the Bank has grown. However, our growth has not changed our commitment to our community.

The Bank employs about 120 people. Its asset size is \$650,000,000, its net loan to deposit ratio averages 106.2 and loans secured by residential properties account for 80 per cent of its loan portfolio. More than three quarters of these loans are made in its assessment area. Currently, Abington Bank has thirteen branches or limited service facilities which serve over twenty two thousand customers, primarily in eastern Montgomery and southern Bucks County, Pennsylvania.

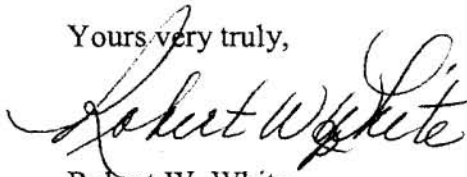
For the past ten years, these customers have selected the Bank as the Number One Community Bank for this area. We believe this selection is based on our ability to service our customers and our support of community activities through donations, sponsorships and the contributions of time and skills by our employees. The regulatory burden of meetings, documentation and data analysis

placed on large banks to demonstrate compliance with CRA stifles the contribution we can make.

In any organization, there are limits to resources. For growing banks our size, there is a real reallocation of resources when we have to comply with the Large Bank CRA criteria. Those resources had to be diverted from our business purposes and the community to reexamine our investments and perform the documentation of our lending and community service. A billion dollar bank can absorb such reallocation better than a half billion bank. Accordingly, we support the purposed definition.

Thank you for your consideration of our position.

Yours very truly,

A handwritten signature in cursive script that reads "Robert W. White". The signature is written in black ink and is positioned above the typed name and title.

Robert W. White
President/CEO

cc: Charlotte M. Bahin, Senior Vice President
Regulatory Affairs, America's Community Bankers