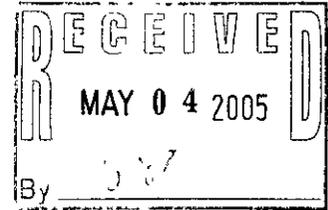




Community Bank

April 28, 2005

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



RE: RIN # 3064-AC89

Dear Mr. Feldman:

As the Chairman of a \$325 million Community Bank that employs 125 people, I fully support the proposal to amend the definition of a small institution to be a bank under \$1 billion in assets.

My institution is committed to the communities we serve. It is simply the way we do business. Moreover, the current asset size of \$250 million is unrealistic in today's financial landscape and has been in place for many years. It is time for an adjustment.

Community banks are struggling with regulatory compliance. This is an area that can be easily changed to give needed relief without weakening the Community Reinvestment Act and its requirements. We are committed to community reinvestment and in order to survive, thrive and compete, we must meet the needs of the customers and communities we serve. We believe in our community and in our customers and want to work with them to provide products and services that best meet their credit needs.

It is absurd that a bank thousands of times larger than my community bank should be examined using the same procedures. I strongly urge you to amend the definition of a small bank for CRA purposes to be an institution with less than \$1 billion in assets, regardless of whether the bank is part of a holding company. This is a good proposal and the right thing to do.

Thank you for considering my views.

Sincerely,

Ralph J. Sommers, Jr.
Chairman

RJS/jam