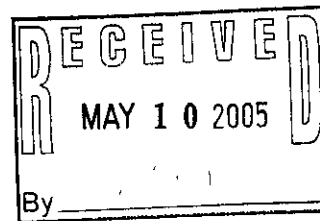




ARCHER BANK

Main Office - 4970 S Archer Avenue • Chicago, Illinois 60632 • (773) 838-3000

Member F.D.I.C.



April 26, 2005

FDIC
Robert E. Feldman, Executive Secretary
Attention: Commentes
550 17th Street Northwest
Washington, DC 20429

Dear Mr. Feldman,

My name is Matthew Tilton, President of Archer Bank located in Chicago, Illinois. Archer Bank is a community bank serving the needs of the Chicagoland area for 43 years with assets of \$490 million. We are recognized for our stellar record of CRA compliance as recently noted by an exam conducted in November 2004.

Archer Bank supports the increase in the asset threshold for "Big Bank" status to \$1 billion; however, we are opposed to the additional requirement of a "Community Development" standard as this is ill defined and ambiguous. Attention to understanding and developing such a program will only detract and draw resources away from the most important CRA criteria - direct lending in low and moderate income areas. Archer Bank is recognized for its outstanding record in direct lending in these areas, investing in excess of 20% of our total assets into direct lending in these areas.

I feel it is important to have a community bank like Archer Bank focus its limited resources to continue serving our assessment area that best matches our expertise with the true needs of the people and small businesses served, not some nebulous program.

Sincerely,

Matthew E. Tilton
Archer Bank