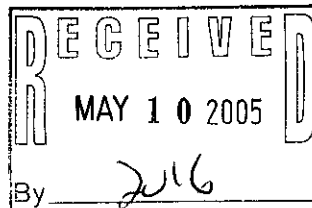


May 5, 2005

Mr. Robert E. Feldman
Executive Secretary
FDIC
550 17th Street, NW
Washington, DC 20429



Re: Comments

Dear Mr. Feldman:

I am writing to you today to state how very pleased we are with your revised CRA examination structure.

Edens Bank is a community bank with assets of \$220 million. We have always enjoyed our commitment to CRA efforts, which have continually resulted in our stellar record with previous CRA exams.

Additionally, I feel that the increase in the asset threshold for "Big Bank" status to \$1 billion is a most favorable move. However, I am most opposed to the additional requirement of a "Community Development Standard", as it appears to be ill defined and ambiguous. Any attention given to the understanding and development of such a program will only detract and draw resources away from the most important CRA criteria ...***direct lending in low and moderate income areas.***

As noted above, we have always enjoyed an outstanding record in direct lending in these areas and as a bank dedicated to the CRA initiatives, we have invested between 10% and 20% of our total assets into direct lending in these same areas.

I have always felt that a community bank can better utilize their limited resources to serve their assessment area in a manner that best matches their expertise with the true needs of the people and small businesses served. Furthermore, ***I believe that this is accomplished through direct lending and not some nebulous program.***

I appreciate your time spent in reviewing my comments and I look forward to future of the CRA program.

Sincerely,

A handwritten signature in cursive script, appearing to read "William D. McGuire".

William D. McGuire
President