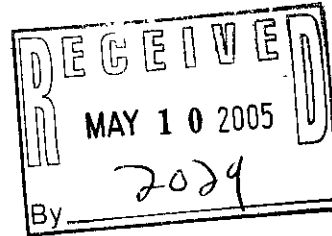




1406 North Main Street
Sturgis, KY 42459
(270) 333-3232
ucbwest.com

April 29, 2005



To Whom It May Concern:

I appreciate the opportunity to respond to the request for regulatory burden relief, as published at 70 FR 5571. I am Garland Certain, President of United Community Bank of West Kentucky Inc, Morganfield, Kentucky. I have been in banking for 28 years. I began my career in a small local community bank, it was purchased and became part of a larger out-of-state corporation, I left there and along with a group of interested individuals and staff started a new community bank three and a half years ago.

Since our bank is a local community bank, we work hard to do the best job possible to serve the community and its members. Often that attempt to serve is hampered by undue and unnecessary regulatory burden. Although this has been the case increasingly since the 1970's, it has become unmanageable since the September 11 terrorist attacks. While we understand the need to secure our country and its financial infrastructure, I question whether the regulations, as implemented and enforced, are accomplishing that goal.

Specifically, I am concerned about the following:

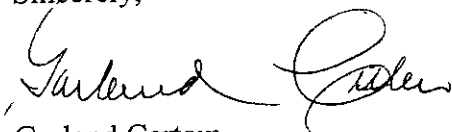
- Bank Secrecy Act. To comply with this Act and its regulations is without doubt one of the most expensive and time consuming in the bank. It is further compounded by complex regulations, lack of clear guidance for bankers, and severe penalties for unintentional or misunderstood noncompliance. The regulations need to be streamlined and clarified. We do not have an employee whose sole responsibility is to be a BSA Officer or Compliance Officer. They have many other duties. Banks need help and advice not punishment.
- Money Service Business. This also applies to other areas of comment in this letter. Banks should not be expected to monitor the individual activities of each of its customers, absent any suspicious activity or regulatory mandates. The burden of reporting and compliance should be placed on actual MSB's, not on the banks. Trying to monitor every business who brings in checks to ascertain if they might have cashed any check in the amount of \$1,000 or over is an undue burden on small banks both in time and expense.
- Regulation D – The restrictions and paying of interest on certain deposit accounts are archaic. We have customers who have needs which we cannot meet due to them not meeting the regulatory requirements (i.e. such as on the money market

deposit accounts). Today's customers' needs, the frequent use of the internet and phone banks to transfer funds all combine to indicate that some of these restrictions need to be revised and/or removed.

- Community Reinvestment Act – As we have become a global and mobile society, existing CRA requirements are no longer evaluative of a bank's investment in and participation with its actual community. To keep a CRA "type" of requirement, changes should be made to modernize and address the changing needs of our industry's communities.

Thank you for the opportunity to make these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Garland Certain".

Garland Certain
President

GC/sa