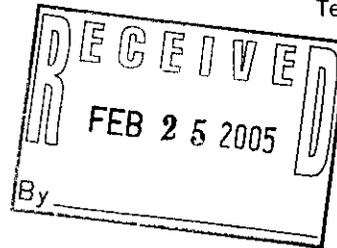


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February 16, 2005

Robert E. Feldman, Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: Reducing Regulatory Burden

Dear Mr Feldman,

Thank you for the opportunity to respond to the Financial Institution Letter FIL-8-2005 dated February 3, 2005 regarding Reducing Regulatory Burden.

We are a small independent bank located in upstate New York with just less than \$300 million in assets. The daily struggle to comply with BSA , in general, we realize is our obligation to fight terrorism in all forms in the world inwhich we live and work. However there are two areas that I feel need addressing and possible change. They are monitoring Money Service Businesses (MSBs) and the Currency Transaction limit of \$10,000.00.

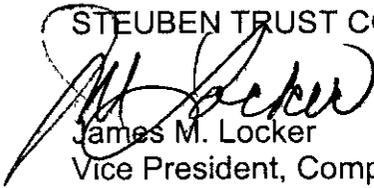
I firmly believe that the monitoring of MSBs is well beyond the responsibilities of a bank to monitor. To us it is the responsibility of the Treasury Department or other agencies that are better suited for this responsibility. We can still monitor the daily activity of the MSB and report on a CTR as necessary, but the additional burden is best handled by someone else.

The CTR threshold of more than \$10,000.00 has been in existence for quite some time and is no longer, in my opinion, a useful number. Inflation alone should raise that amount to at least \$30,000 00 before a CTR is required.

I, again, appreciate the opportunity to discuss my concerns with you and hope you will consider my comments stated above.

Sincerely,

STEUBEN TRUST COMPANY


James M. Locker
Vice President, Compliance and BSA Officer