

From: Kim Christensen [mailto:KChristensen@sbsu.com]  
Sent: Thursday, May 05, 2005 5:29 PM  
To: Comments  
Subject: Comments - 12 CFR Part 345 - RIN3064-AC89

Robert E. Feldman, Executive Director  
Federal Deposit Insurance Corp.

Dear Mr. Feldman,

Thank you for the opportunity to comment on the proposed revisions to the Community Reinvestment Act regulations. I am employed by State Bank of Southern Utah which is a small bank in the Southwestern portion of Utah. State Bank has a successful record of investing in and serving the areas in which we have offices. All of our offices create a significant benefit to the local communities that we serve. Several of our offices are the only Bank in town because we are located in many small rural areas.

I strongly support raising the threshold for small bank CRA requirements to \$500 million or even higher. In my opinion the small bank test does a good job of measuring community reinvestment activity without overburdening small banks with the time and money spent to comply with CRA that the large banks expend. I think that it has been shown that small banks actually help their communities as much or more than large banks do.

I would also recommend that the threshold for small banks be indexed to the CPI or other appropriate index so that the size issue does not have to be revisited often.

I would recommend support of an intermediate small bank category to offer flexibility of the community development test but would not support the community development test as a separate part of the CRA exam. To require both would create a great deal of unfairness in requiring the regular exam requirements to be met and then also to have to meet the community development test also.

I believe that "rural" should be defined as any area outside of a standard metropolitan area. Our Bank has a number of economically challenged areas that need economic development and investment which we currently help with but we are the only Bank located in the area. We should be able to receive credit for serving these under served areas.

Thank you again for allowing our comments. We look forward to hearing that some regulatory relief is justified so that we can continue to help our local communities and the families therein.

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