

May 6, 2005

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

RE: RIN Number 3064-AC89

Dear Mr. Feldman:

Commercial Bank and Trust Company has three assessments areas (two rural counties, and a metropolitan area). However, the bank is a small player in the metropolitan area with three offices compared to over 150 banks within a 25-mile radius. Our asset size is 441 million.

Asset Threshold

Commercial Bank is strongly in favor of the CRA proposal to raise the threshold for a small bank from \$250 million to \$1 billion and the elimination of the holding company asset limit. This eliminates the data collection and reporting requirements which is one of the lesser burdens of the regulation. Reports and software should adequately handle this for banks.

Community Development Test

The bank strongly opposes the new community development test that would be separately rated in CRA examinations for “intermediate small banks”. This is only a token change to community development. This is the criteria that large banks currently struggle with. Statistics indicate that more than 33% of reporting lenders did not originate even one community development loan in 2003. It is very difficult for a community bank to generate a community development loan that has not already been reported as a small business loan or taken by a mega-lender. In the event a separate community test is retained, it is the banks recommendation it be weighted less than the lending test.

*We are asking the agencies to reconsider the community development test altogether.*

Definition

It is recommended the definition of “rural” be defined as consistent with the definition used by the Census Bureau.

It is the desire of our bank to meet the needs of all our communities and all individuals in our communities. The change being proposed would not affect the way our bank works to meet the credit needs of our communities.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Jean Wimberley  
AVP/Compliance Officer/CRA Officer  
Commercial Bank and Trust Company  
Paris, Tennessee