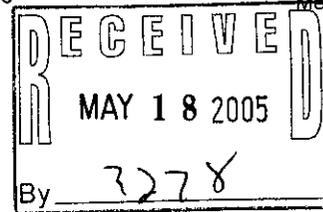


# Citizens Community Bank

Main Office - 3322 S Oak Park Avenue • Berwyn, Illinois 60402 • (708) 749-5600

Member FDIC

Robert S. Powell  
President



May 16, 2005

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

Dear Mr. Feldman:

I am the President of Citizens Community Bank in Berwyn, Illinois with an asset size of just over \$200 Million and would like to respond to the revised CRA exam structure. I support the increase in the asset threshold for "Big Bank" status to \$1 billion but have to oppose the additional requirement of a "Community Development" standard since I am unclear as to what this standard is or will be in the future. Trying to understand and meet such a standard will detract and draw our limited resources away from the most important CRA criteria – direct lending in low and moderate income areas.

As a subsidiary of a "Big Bank" up until last year we went through very thorough CRA exams and have always received at minimum a Satisfactory rating and even awarded an Outstanding rating on the lending test and High Satisfactory on our service test at our last exam. We now operate as a locally owned community bank and will continue to serve our investment area in a manner that best matches our expertise with the true needs of the people and small businesses we serve in the near west suburbs of Chicago.

Please review the CRA exam structure and eliminate the need for the "Community Development" standard recognizing again that with limited resources the best way for a community bank to impact their investment area is through direct lending.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Powell".

Robert Powell