

**From:** William W. Watson [mailto:wwwatson@ckbonline.com]  
**Sent:** Tuesday, April 26, 2005 1:54 PM  
**To:** Comments  
**Subject:** FW: RIN number 3064-AC89

-----Original Message-----

**From:** William W. Watson [mailto:wwwatson@ckbonline.com]  
**Sent:** Tuesday, April 26, 2005 12:51 PM  
**To:** cornrnents@FDIC.gov  
**Cc:** Peter Gwaltney (gwaltney@lba.org); Michael Vizard (mvizard@ckbonline.com)  
**Subject:** RIN number 3064-AC89

Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17 Street, N.W.  
Washington, D.C. 29429

Attention: Comments/LegalESS

Re: Community Reinvestment

RIN number 3064-AC89

**Dear Sir:**

**As a community banker, I am pleased to comment in support of the proposal issued by the FDIC that would amend the definition of a small institution to be a bank that is under \$1 billion in assets. I believe that this change will provide much needed regulatory burden relief for me and other community bankers. It seems that every week there is a new or additional regulation with which we must comply. This is one example of regulatory burden relief that will really make a difference. I would much rather use the limited resources available to my bank to serve my community than to collect and maintain data and documents to prove to examiners that I am meeting the needs of my community.**

*I am Chairman of the Board of a \$233 million bank founded in 1902 in the poverty stricken Delta region of Northeast Louisiana. As our income and population over the years continued to dwindle, we took it upon ourselves to expand into nearby cities (where much of our population had migrated) through de novo branching, where local community banks there had succumbed to the "sell out" mentality that had effected so much of the banking industry.*

*I wonder if any of you have any idea how much influence the growing complication of regulatory compliance may have had on the decisions, particularly of older Directors simply tired of the hassle, to cash in their chips and turn more of our industry over to the regional giants?*

*I also would like to suggest that 'real' American bank depositors do not need 'special interest groups' to protect them from community banks, but may well need them, the U. S. Military, and the government to protect them from the large city and regional banks.*

**Compliance with the Community Reinvestment Act is something we take very seriously at our bank. We don't just believe it is the right thing to do; we believe it is the right business thing to do. No community bank can survive and compete without meeting the needs of its customers and communities. We believe in our community and in our customers and want to work with them to provide products and services that best meet their credit needs. We do not need a complicated examination process to show that we are complying with the law.**

**It is absurd to think that a bank thousands of times larger than my own community bank should be examined using the same procedures. I strongly urge you to amend the definition of a small bank for CRA purposes to be an institution with less than \$1 billion in assets, regardless of whether the bank is part of a holding company. This is a good proposal and is the right thing to do.**

**Thank you for considering my views.**

**Sincerely,**

**William W. Watson  
Chairman of the Board  
Cross Keys Bank  
St. Joseph, La**