

From: Kari West [mailto:kwest@AHB-OK.com]
Sent: Tuesday, April 26, 2005 1:28 PM
To: Comments
Subject: Spam:Docket # R-1225

April 26, 2005

Robert E. Feldman, Executive Secretary
Attn: Comments/Legal ESS
Federal Deposit Insurance Committee
550 17th Street N.W.
Washington, DC 20429

Re: Docket No. R-1225

Mr. Feldman:

I am writing as a community banker in support of the Federal Reserve's proposal to increase the asset size limit of the CRA exam for "large banks" to \$1 billion.

Our bank has \$480 million in assets with 11 offices in nine small towns, none of whose population exceeds 20,000 people. We have very little in common with large banks other than the name bank itself.

We have no higher purpose nor objective other than to build our communities, since the welfare of our bank is directly dependent on the welfare of the towns in which we do business. At our last CRA exam, we received a rating of "High Satisfactory".

We have suffered through two "large bank" CRA exams. While the quality of the examiners is not in question, the quality of the examination guidelines and procedures is in question and is a large problem for us. The exam is overwhelming, overly burdensome, very time consuming, ineffective, and costly. Just preparing for this exam and trying to prove ourselves to the examiners takes valuable time away from our community efforts.

The exam leaves little room for innovation, and it actually encourages us to make investments that take resources out of our community. We are downgraded for activities that benefit the entire community, because they don't exclusively benefit just low-to-moderate income geographies.

Well over 90% of our loans are in our assessment area, an area which contains no high-income census tracts but which has several low-to-moderate income census tracts in it.

We do not yet understand the new criteria for the exam of a "small intermediate bank" nor the Community Development definition, which is being considered, but we are

hopeful that it is a more reasonable effort than what we have previously seen. We also hope that we are not associated with large banks in any way and that you will work to streamline your procedures in the CRA exam. This will build better communities for everyone.

I would be happy to visit with you at anytime. Thank you for your consideration.

Sincerely yours,
Guy L. Berry
President

DISCLAIMER:

This email and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed. This communication represents the originator's personal views and opinions, which do not necessarily reflect those of American Heritage Bank. If you are not the original recipient or the person responsible for delivering the email to the intended recipient, be advised that you have received this email in error, and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you received this email in error, please immediately notify security@ahb-ok.com.