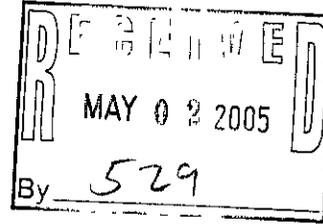


# FIRST AMERICAN INTERNATIONAL BANK

恆通銀行

April 25, 2005

Mr Robert Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> St, N W  
Washington, D C 29429



Attention Comments/LegalESS

Re Community Reinvestment  
RIN number 3064-AC89

Dear Mr Feldman,

This is to comment in support of the amendment to define a small institution to be a bank that is under \$1 billion in assets for purposes of CRA compliance

I cannot tell you how onerous have been the impact to small community banks of recent compliance issuance and regulations In this case, you have the opportunity to provide some relief to us

The basis for our position is that as a community bank, our major competitive advantage is that we remain focused on community development and provide product and services better than major banks Primarily, this consists of lending to local community businesses and residents and supporting all manners of community development We always exceed the spirit and letter of CRA requirements

We are a \$200 million Total Assets bank that is focused on Chinese American businesses and residents in the New York City metro area and employ over 100 multi-lingual staff-members with extensive branch hours to meet our customers' needs Over 90% of our loans are made to local businesses and residents and we maintain a ratio of 68% loans to deposits We are a certified Community Development Financial Institution (CDFI) and a designated Minority Bank by the FDIC We do not need a complicated examination process to show that we are complying with CRA requirements nor do we need a process that is really applicable to banks that are significantly larger in size

This amendment would allow us to remain competitive by allowing us to focus on meeting community needs rather than spending valuable resources on simply complying with additional regulations

Thanks for your kind consideration

Sincerely,

Alfonso Lau  
President