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June 6, 2001

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

Jennifer J. Johnson, Secretary  
Board of Governors of the Federal  
Reserve System  
20<sup>th</sup> Street & Constitution Avenue, NW  
Washington, DC 20551

Public Information Room  
Office of the Comptroller of the Currency  
250 E Street, SW  
Washington, DC 20219  
Attention: Docket No. 01-06

Re: Prohibition on Use of Interstate Branches for Deposit Production  
66 *Federal Register* 18411, April 9, 2001

Dear Sir or Madam,

The American Bankers Association ("ABA") is responding to the request for comment from the federal banking agencies on their joint proposal to implement a provision in the Gramm-Leach-Bliley Act of 1999 ("GLBA") amending section 109 of the Riegle-Neal Interstate Banking and Branching Efficiency Act of 1994 ("Riegle-Neal Act") and the rules promulgated thereunder. ABA brings together all categories of banking institutions to best represent the interests of this rapidly changing industry. Its membership—which includes community, regional and money center banks and holding companies, as well as savings associations, trust companies and savings banks—makes ABA the largest banking trade association in the country.

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CONTINUING OUR LETTER OF

June 6, 2001

SHEET NO. 2

Section 109 of the Riegle-Neal Act prohibits a bank from establishing or acquiring a branch or branches outside of its home state primarily for the purpose deposit production. GLBA Section 106 amended section 109 to expand its scope to include *any* branch of a bank controlled by an out-of-State holding company including a bank comprised solely of a main office. The Riegle-Neal Act did not previously apply to all branches controlled by an out-of-state holding company, as for example, when a national bank relocates its main office across state lines but retains branches located in its original home state, or to a bank consisting only of a main office.

Because the agencies' proposal simply effectuates the amendment required by GLBA Section 106, ABA has no objection to the proposal.

Sincerely,

A handwritten signature in cursive script that reads "Cristeena G. Naser".

Cristeena G. Naser