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April 1, 2005

Mr Robert E Feldman
Executive Secretary
Attention Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re RIN 3064-AC89

Dear Mr Feldman,

I am the Vice President and Compliance Officer of Wood & Huston Bank in Marshall, Missouri I am writing to comment on the FDIC's proposal to change the category of small banks to those under $1 billion in assets and add a community development test for banks with assets between $250 million and $1 billion

We are opposed to having a separate test for community development We were a small bank, under $250 million in assets, a few years ago and were examined using the current small bank examination criteria We received an "outstanding" rating during that examination Once we grew to over $250 million in assets we of course were examined under the large bank criteria, and though we had the same numbers we had during the prior exam, our rating dropped to a satisfactory one It was not because our bank had done anything different in satisfying the credit needs of our community It was not because we decided not to lend to any particular group or area It was simply that we were then expected to have investments, services, and loans that met a very defined criteria dealing with low to moderate-income areas

Being located in one of the 60% of nationwide non-metropolitan counties without a low to moderate-income area we are very limited in what we can do to find any qualifying investments or loans However, we continue to carry a loan to deposit ratio of over 95% and most of that money goes right back into our assessment area If you need a definition of community development you can do no better than a bank lending back into its community along all income levels

While admirable that the proposal includes a "flexible" new community development test, flexible procedures applied in real life often mean inconsistent procedures

My recommendation would be if you had to have additional criteria in the evaluations for banks between $250 million and $1 billion in assets it would look at the small loan and business loans being made by a bank in its community Loans to individuals could be assessed through the normal small bank criteria. We would rather keep the burden of reporting CRA data of loans to small businesses and small farms and have that data used in the exam than have to abide by a definition of a community development loan that is made in the ambiguous definition of "underserved rural areas "

The burden of reporting small farm and small business loans is heavy at times However, the burden of reporting is better to face than the possibility of facing a "Needs to Improve" rating when the bank is following the original and current intent of the Community Reinvestment Act which is to replace funds back into the community the bank is pulling them from If faced with either remaining a large bank or being examined as a small bank with a separate community development test that has a lot of unknowns, we would rather remain a large bank under the CRA criteria

Sincerely,

Jeff Crawford
Vice President
Compliance Officer