

From: Fahn, Jay [<mailto:jfahn@scsbnet.com>]  
Sent: Sunday, March 20, 2005 8:30 AM  
To: Comments  
Subject: RIN No. 3064-AC89 - CRA Regulations.

To Whom it may Concern:

I work in a community bank in Western Iowa. We are about \$200 million in size and serve a wide variety of customers. As a result of our affiliation with a larger holding company bank, we have been subject to Large Bank CRA for the past two years. Please allow me to share some of the burdens this places on our rural bank.

First, it requires an additional 10-15 minutes of time to process a loan. This time could be spent helping customers who are waiting or help my co-workers with other items and questions. Secondly, collecting this extra documentation, creates questions that I need to ask our Compliance Officer. This cuts into her work efficiency because she has many other responsibilities. Finally, all the time we spend to diligently collect this data serves no one. The vast majority of the data we collect is similar to the area we serve. We serve no metro areas, only a rural Iowa county, that is more similar than different.

Thank you for the opportunity to make comment on this proposed change. By making this change, you will do a great favor for us and in turn, our customers.

Sincerely,

Jay J. Fahn, VP  
Shelby County State Bank  
Panama, IA 51562