



April 29, 2005

Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 29429

Attn: Comments/LegalESS

RE: Community Reinvestment
RIN number 3064-AC89

Dear Sir:

As a community banker, I am pleased to comment in support of the proposal issued by the FDIC that would amend the definition of a small institution to be a bank that is under \$1 billion in assets. I believe that this change will provide much needed regulatory burden relief for me and other community bankers. It seems that every week there is a new or additional regulation with which we must comply. This is one example of regulatory burden relief that will really make a difference. I would much rather use the limited resources available to my bank to serve my community than to collect and maintain data and documents to prove to examiners that I am meeting the needs of my community.

Gorham Savings Bank, a mutual institution founded in 1868, has total assets of almost \$617 million, with 9 branch offices and an average of 162 employees. The Bank provides a range of personal and small business financial products and services to its communities. The Bank also offers personal and business insurance products through a subsidiary, as well as investment services through a third-party brokerage arrangement. Gorham Savings Bank is committed to mutuality and accordingly is steadfast in measuring its success by the meaningfulness of all of its various community investments -- not just financial but also in terms of time, people, products, services. For the Fiscal Year ending March 31, 2005, GSB contributed in excess of \$150,000 to 150+ community organizations. Over the past five years, Gorham Savings Bank's total giving has exceeded \$500,000. Over 60 employees generously donate their time, talent and

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financial resources to countless local community organizations. In the past twelve months, GSB employees gave over 5,000 hours of their own time.

Community investment, and thus compliance with the Community Reinvestment Act, is something we take very seriously at our bank. We don't just believe it is the right thing to do; we believe it is the right business thing to do. No community bank can survive and compete without meeting the needs of its customers and communities. We believe in our community and in our customers and want to work with them to provide products and services that best meet their credit needs. We do not need a complicated examination process to show that we're complying with the law.

It is absurd to think that a bank thousands of times larger than my own community bank should be examined using the same procedures. I strongly urge you to amend the definition of a small bank for CRA purposes to be an institution with less than \$1 billion in assets, regardless of whether the bank is part of a holding company. This is a good proposal and is the right thing to do.

Thank you for considering my views.

Sincerely,



Christopher W. Emmons
President and CEO

CEW:bsh

cc: Lori A. Desjardins, CRA Officer, Gorham Savings Bank
Charlotte Bahin at cbahin@acbankers.org