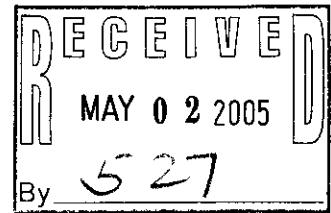




Corporate Office, 35 Plains Road, P.O. Box 950, Essex, CT 06426-0950
Telephone (860) 767-4414 Fax (860) 767-4411
E-mail gshook@essexsavings.com



GREGORY R SHOOK
President and Chief Executive Officer

April 21, 2005

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

Attention: 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. While you constantly move the goal posts the larger banks continue to try to erode our business footings by cutting rates on deposits and loans as they try to build market share and bury the independent one market banks. You can send a signal that Washington is concerned for value of the smaller independent banks that serve on local boards and provide relationship banking that is straight forward and consultative. This is one step of regulatory burden relief that will show that it isn't about squeezing and shrinking the amount of community banks. I would much rather use the limited resources available to my bank to serve my community and make personal banking calls to prove our service is important than to collect and maintain data and documents to prove to examiners that I am meeting the needs of my community.

Essex Savings Bank was established in 1851 as a mutual savings bank. Since 1996 we have given 10% of our net after tax income to over 200 non- profits in our delineated market area. These funds are vital for the quality life supported by these 501c3 operations and does not help us in the over \$250 million category evaluation. Our generosity could be jeopardized if we had to expend funds and energy as we go over the \$250 million threshold. Our current asset size is \$220 million. Just five years ago we were about \$135 million after 148 years of meeting the needs of our community in numerous ways.

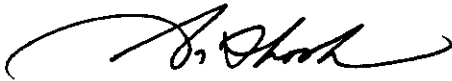
Compliance with the Community Reinvestment Act is something we take very seriously

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 work with them to provide products and services that best meet their credit needs. We would like to continue as pass through the 250 million point and we do not need a newer complicated examination process to show that we are complying with the law.

I do not believe you should review community banks using the same procedures. Do not penalize us for growing and surviving against the back drop of the larger institutions with more resources who would love us to need capital and then buy us. Compliance is one way for directors to say the risks are too high and question whether we can survive in the long run. 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 and would send a signal that you really want the smaller institutions to survive and continue doing the good work that have the core of our business model since inception.

Thank you for considering my views.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Shook", with a large, sweeping flourish extending to the left.

Gregory R. Shook
President & CEO