From: Cindy Bailey [mailto:cbailey@communitybanknet.com]

Sent: Friday, April 01, 2005 3:45 PM

To: Comments

Subject: FIL-21-2005

To whom it may concern,

I would like to submit my comments on the new CRA proposal. First, increasing the threshold for a large bank to 1 billion dollars is a good idea. Second, giving credit for community development lending in underserved or distressed rural areas even when the area is technically not designated by the government as low or moderate income is another good idea.

This concept helps provide community development lending credit to the banks serving communities in rural areas.

The idea of adding a new category of "intermediate small bank" is a terrible one. If a small bank can pass a CRA exam just on lending and a large bank can also for all practical purposes. Why should an "intermediate small bank" be required to pass both lending and community development test?

We continually ask for regulatory burdens to be eased across the board. This is an opportunity to give relief, not cause another burden.

Sincerely,

Cindy Bailey CRA Officer Community Bank Joseph, OR

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