



Huron Community Bank

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March 26, 2004

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Ave, NW
Washington, DC 20551

Re: Docket No. R-1183

Ms. Johnson:

As a community banker, I strongly endorse the federal bank regulators' proposal to increase the asset size of banks eligible for the small bank streamlined Community Reinvestment Act (CRA) examination from \$250 million to \$500 million and elimination of the holding company size limit, currently at \$1 billion. This proposal will greatly reduce regulatory burden. I am the Community Reinvestment Officer and Commercial Lender for Huron Community Bank, a \$165 million bank located in East Tawas, Michigan.

The small bank CRA examination process was an excellent innovation. As a community banker, I applaud the agencies for recognizing that it is time to expand this critical burden reduction benefit to larger community banks. At this critical time for the economy, this will allow more community banks to focus on what they do best – fueling America's local economies. When a bank must comply with the requirements of the large bank CRA evaluation process, the costs and burdens increase dramatically. In addition, the resources devoted to CRA compliance are resources not available for meeting the credit demands of the community. For example, in my bank this amounts to about \$10,000 annually in wages and direct expenses associated with CRA compliance.

Adjusting the asset size limit also more accurately reflects significant changes and consolidation within the banking industry in the last 10 years. To be fair, banks should be evaluated against their peers, not banks hundreds of times their size. The proposed changes recognize that it is not right to assess the CRA performance of a \$500 million bank or a \$1 billion bank with the same examination procedures used for a \$500 billion bank. Large banks now stretch from coast-to-coast with assets in the hundreds of billions of dollars. It is not fair to rate a community bank using the same CRA examination used for huge institutions. And, while the proposed increase is a good first step, the size of banks eligible for the small bank streamlined CRA examination should be increased to \$2 billion, or at the minimum \$1 billion.



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Ironically, community activists seem oblivious to the costs and burdens of CRA examinations. And yet, they object to bank mergers that remove the local bank from their community. This is contradictory. If Community groups want to keep the local banks in the communities where they have access to the decision makers, they must recognize that regulatory burdens are strangling smaller institutions by forcing them to consider selling to larger institutions that can better manage these burdens.

Increasing the size of banks eligible for the small bank streamlined CRA examination does not relieve banks from CRA responsibilities. Because the survival of many community banks is closely intertwined with the success and viability of their communities, this increase will merely eliminate some of the most burdensome requirements.

To summarize, I believe that increasing the asset size of banks eligible for the small bank streamlined CRA examination process is an important first step to reducing regulatory burden. I also support eliminating the separate holding company qualification for the streamlined examination, because it places small community banks that are part of larger holding companies at a disadvantage to their peers. While community banks still comply with the general requirements of CRA, this change will eliminate some of the most problematic and burdensome elements of the current CRA regulation from community banks that are drowning in regulatory red-tape. I also urge the agencies to seriously consider raising the size of banks eligible for the streamlined examination to \$2 billion, or at least \$1 billion in assets.

Sincerely,

A handwritten signature in black ink, reading 'Peter J. Mancini'. The signature is written in a cursive style with a light gray background behind it.

Peter J. Mancini, VP
Huron Community Bank