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Subject: Community Reinvestment Act

To The Board of Governors of the Federal Reserve System:

As a Commercial Real Estate Lender at a \$400 million community bank in Orlando, Florida, I support the CRA proposal to raise the large bank threshold from \$250 million to \$1 billion. Additionally, I believe that it is a good idea to allow community development credit for lending in underserved or distressed rural areas even when they technically are not designated as low or moderate income communities.

However, I do not support adding a new category of "intermediate small banks" which will be subject to a special form of CRA examination. Instead of simplification or regulatory relief, the proposal results in making CRA much more complicated and it increases our compliance burden.

Under the proposed "intermediate small bank" rules, a satisfactory CRA rating would require a satisfactory grade on both the old small bank lending test and on the new community development test. Currently, a small bank can pass CRA on lending performance and for all practical purposes so can a large bank. It is unfair that an "intermediate small bank" be required to pass both of these tests.

The proposed flexible community development test lists such vague criteria that it is impossible to specifically forecast what a bank will need to do to obtain a satisfactory rating. These rules provide no guidance to banks regarding the passing of the test and leave the determination to the subjectivity of the examiners. There is no indication as to the type of documentation required to obtain a satisfactory rating.

The compliance burden of intermediate small banks" would cost much in terms of talent, time, and money. Wouldn't these resources be better utilized elsewhere?

To raise the large bank threshold from \$250 million to \$1 billion would provide true regulatory relief for community banks like FCB of Florida. Your consideration in making this a reality is sincerely appreciated!

Regards,

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