CONNECTICUT BANKERS ASSOCIATION

Lindsey R. Pinkham
Senior Vice President
& Secretary

VIA Electronic Mail May 10, 2005

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, D.C. 20429

Re: RIN Number 3064-AC89

Office of the Comptroller of the Currency
250 E Street, SW
Mail Stop 1-5
Washington, D.C. 20219

Re: Docket No. 05-04

Ms. Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20 Street and Constitution Avenue, NW
Washington, D.C. 20551

Docket No. R-1225

Ladies & Gentlemen:

This letter is written to comment on the proposed amendments to the Community Reinvestment Act ("CRA") regulations on behalf of the sixty-nine member banks of the Connecticut Bankers Association (the "CBA"). This proposal would directly impact twenty-one of our member banks whose current asset size is between $250 million in assets up to $1 billion. In addition, this change will soon impact another eight of our member banks

currently just under the $250 million asset threshold and eventually seventeen other member community banks as they grow in asset size in the years ahead.

We thank the Agencies for proposing these long overdue changes. The CBA strongly supports the proposed changes to the CRA examination regulations that would amend the definition of a small institution to be a bank that is under $1 billion in assets. To have a $500 million asset sized institution subject to the same rules as that of a $50 billion asset sized bank is unreasonable.

At the request of our member banks directly impacted by this proposal, please note the CBA's positions on the following items:

- We strongly support the Agency's proposal to raise the threshold for the streamlined small bank CRA examination to $1.

- We also support a proposed change adding an inflation adjustment to the threshold based on the CPI.

In closing, it is important to note that the streamlined CRA exam is not an exemption from CRA, but a more cost effective and efficient way to examine a community bank's compliance efforts to meet not only the letter, but the spirit of CRA regulations. Thank you for giving us the opportunity to submit these comments. Please feel free to contact me if you have any questions on the contents of this letter.

Very truly yours,

Lindsey R. Pinkham
Senior Vice President & Secretary