



Office of Thrift Supervision

Department of the Treasury

1700 G Street, N.W., Washington, DC 20552 • (202) 906-6000

Because of the volume of comments received on No. 2004-53, OTS is posting the comments received on this proposal in a different format to allow the agency to post comments more efficiently. Where identical comments have been received from more than one individual, the template letter will be posted with a link to an alphabetical list of those submitting that comment ("signatories"). Originals of all comments received may be reviewed at the agency under the procedures described in the notice of proposed rulemaking. This procedure affects only the posting to the website and does not affect how comments will be counted and considered -- each individual's comment will still be treated separately.

The list of signatories to this comment may be found [here](#).

January 19, 2005

Regulation Comments, Chief Counsel's Office
Office of Thrift Supervision
1700 G. Street N.W.
Washington, D.C. 20552



The Bank that's not for sale!

Attention: No. 2004-53

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Re: **Community Reinvestment Act - Community Development, Assigned Ratings**
69 FR 68257 (November 24, 2004)

Dear Sir or Madam:

On behalf of LaSalle Federal Savings Bank, we appreciate the opportunity to comment on the proposal issued by the Office of Thrift Supervision that would provide additional flexibility to savings associations in meeting the requirements imposed by the Community Reinvestment Act. We strongly support the proposal to provide additional flexibility to the definition of "community development," and believe that this change is long overdue. We request the OTS to adopt the proposal because we view it as real regulatory relief.

Further, we strongly support the proposal to provide flexibility in assigning ratings for CRA purposes. We meet the needs of our community every day, but the burden of meeting the requirements of the CRA regulation diminishes our ability to use the resources where they are most needed in our community. Permitting institutions to determine how best to allocate this time, financial support and human capital will help those in the community who need it most - and all the bank regulators should recognize this.

We appreciate the OTS's creative and innovative efforts to help us solve the conflict that sometimes arises in trying to comply with a regulation and yet meet the real needs of our community. Providing us the flexibility to determine how much weight should be assigned to the lending, investment and service tests will permit us to make choices involving our community that are based on what it needs, whether it is lending, investment, or service, and not governed by goals that are established elsewhere.

Community banks are burdened by so many regulations that impact all aspects of operations, we need relief from the requirements that result in no benefit for our community or customers. We welcome relief from the arbitrary burdens imposed by the current CRA examination weightings.

Serving the needs of our community is why we are in business. We urge all of the federal banking regulators to look for ways to eliminate some of the burden of compliance. This is a good step and we strongly support the OTS.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Robert B. Baldwin
President

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