

From: "April Kelso" <akelso@glacierbancorp.com> on 02/24/2004 03:50:19 PM
Subject: Regulation BB - Community Reinvestment Act

I would like to comment on the proposed changes to the CRA. The investment test for large banks should be revised and weigh less or revised to give more credit to donations/one-on-one involvement. Our banks are located in Montana and Idaho in many rural areas where there are no investment opportunities. Rather than throw a million dollars at a bond or some such item, we prefer a hands on approach by investing our time, personnel and dollars to local groups that benefit from our assistance. It seems we have to fight the examiners every exam on getting credit for these. On the other hand, our banks usually receive a low satisfactory on the investment test but several have still received overall outstandings so how much weight is really given to the investment test. I urge you to review this section of the regulation again, keeping in mind banks in low population states. Thank you.

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