November 13, 2001

Tamara R. Manly
Office of Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
Attention: Comments/OES

Public Information Room Office of the Comptroller of the Currency 250 E Street, SW Mail Stop 1-5 Washington, DC 20219 Attention: 1557-0014

Information Collection Comments Chief Counsel's Office Office of Thrift Supervision 1700 G Street, NW Washington, DC 20552 Attention: 1550-0005

Re: Interagency Charter Application and Deposit Insurance Application (66 FR 48168)

Dear Sir or Madame:

The Conference of State Bank Supervisors (CSBS) is pleased to have the opportunity to respond to the federal banking agencies' (the Agencies) joint notice and request for comment on proposed revisions to the charter application of the Office of the Comptroller of the Currency (OCC) and Office of Thrift Supervision (OTS) and to the Federal Deposit Insurance Corporation's (FDIC's) deposit insurance application (applications). CSBS is the national organization of state officials responsible for chartering, regulating and supervising the nation's 6,868 state-chartered commercial and savings banks and 419 state-licensed branches and agencies of foreign banks.

CSBS generally supports the proposed changes. We appreciate that the application is designed to provide accommodations for instances where individual jurisdictions may require supplemental information. For example, we believe the applications are compatible with variations that may exist with respect to state laws governing the confidentiality of certain application information.

¹ 66 Fed. Reg. 48168-48169, (Sept. 18, 2001).

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Accordingly, the CSBS Regulatory Committee of state banking departments is recommending that the application be uniformly adopted by all states.

CSBS is particularly appreciative of the opportunity to work with the Agencies on a cooperative basis during the initial drafting of the applications. Inclusion of the state perspective ensures that the benefits derived from a uniform application accrue to all participants in the dual banking system. We look forward to working with you on other interagency efforts as they arise.

Thank you for your consideration and we invite you to call on us if we can provide additional information.

Best personal regards,

Mail Milan

Neil Milner

President and CEO