

March 22, 2010

The Honorable Christopher J. Dodd
United States Senate
448 Russell Senate Office Building
Washington, DC 20510-29203

Dear Senator Dodd:

One of the many blessings the New England region enjoys is that mutual banks make up a significant part of its banking industry. We are writing today to ask that you take steps as financial regulatory reform legislation moves through the Senate Banking Committee this week to ensure there are healthy, viable charter options for mutual banks to continue serving their communities in the future.

Specifically, the proposed Banking Committee legislation released on Monday, March 15, 2010 does not include an option for state-chartered mutual banks to convert to a federal charter. The bill also proposes to eliminate the Office of Thrift Supervision (OTS) which currently regulates federally-chartered mutuals. While the bill would transfer oversight of all currently OTS-regulated banks to the Office of the Comptroller of the Currency (OCC), it does not create a national mutual bank charter option within the OCC. Therefore, the bill does not include a viable federal charter option for mutual banks.

The financial regulatory reform bill already approved by the House of Representatives does recognize the importance of maintaining a strong mutual banking industry by including language to create a national mutual bank charter option, as well as a separate division for all federal savings institutions: both mutual and stock.

Please help us preserve mutuality by working to insert similar language in the Senate bill.

Sincerely,

Gerald H. Little, President
New Hampshire Bankers Association

Gerald M. Noonan, President & CEO
Connecticut Bankers Association

Daniel J. Forte, President
Massachusetts Bankers Association

William A. Farrell, Esq., Legal Counsel
Rhode Island Bankers Association

Christopher Pinkham, President
Maine Association of Community Banks

Christopher D'Elia, President & Treasurer
Vermont Bankers Association