

July 9, 2015

Dear Sirs,

Please post this anonymous comment from the public at the June 22, 2015 MSAAC meeting.

Signed,

A Concerned Citizen

The questions to ask about a special provision to keep the mutual bank charter are the following. If the aggregate loans-to-assets ratio is an estimated 55%-60%, how can management claim that mutual banks support the local community? If the current interest rate for a one year CD at Watertown Savings Bank, Eastern Bank, and Ion Bank are 0.10%, 0.20%, and 0.25%, respectively, is mutuality actually a danger to the local community? After all, lower deposit costs could be used to increase management's compensation. Print outs with the rate information is enclosed. Is it reasonable to assume that about 25% of all mutual savings banks, particularly the smaller ones, are not profitable? Is that percentage around 40% if one focuses on core or recurring earnings that excludes loan sale gains?

Mutual bank assets make up less than 1% of total banking assets and management wants special treatment. But there is nothing special about a mutual's product line! Mortgages and deposits are essentially undifferentiated commodity products offered by commercial banks, thrifts, credit unions, etc. The quaint mutual bank does not enjoy the same status as Mt. Rushmore or Thomas Edison's Laboratory as some would lead regulators to believe. Given the unique ownership form of a mutual, does one special interest group seeking to preserve the charter suggest a possible moral hazard?

To summarize, is the real issue here a self-serving management seeking to use the surplus of an institution with a vague, ill-defined ownership form for personal gain? How should regulators respond to protect the deposit insurance fund?

Premier Account CDs

Term	APY*	Interest Rate	Method of Compounding	Minimum Opening Deposit
3-5 Month CD	0.05	0.05	Simple	\$2,500
6-11 Month CD	0.05	0.05	Simple	\$2,500
12-23 Month CD	0.20	0.20	Monthly	\$500
24-35 Month CD	0.30	0.30	Monthly	\$500
36-47 Month CD	0.40	0.40	Monthly	\$500
48-59 Month CD	0.50	0.50	Monthly	\$500
60+ Month CD	0.60	0.60	Monthly	\$500

* Annual Percentage Yield (APY) is accurate as of 6/1/15 and is subject to

CD Account Rates

Enjoy the comfort of earning a higher rate of interest on your funds, while avoiding any risk to your principal. We offer certificates of deposit with competitive rates and a broad range of maturity dates.

WEDNESDAY, JULY 8, 2015

Term	Minimum to Open	Interest Rate	APY
CDS FOR CHECKING ACCOUNT CUSTOMERS¹			
Special Long Term Certificate- 47 month	\$1,000	1.24%	1.25%
Special Medium Term Certificate- 27 month	\$1,000	.50%	.50%
Special Short Term Certificate- 7 month	\$1,000	.15%	.15%
SPECIAL MONEY MARKET CD²			
120-Day Money Market	\$1,000	.05%	.05%
REGULAR CDS			
Three Month	\$1,000	.10%	.10%
Six Month	\$1,000	.10%	.10%
Nine Month	\$1,000	.10%	.10%
Eleven Month	\$1,000	.10%	.10%
One Year	\$1,000	.10%	.10%
Fifteen Month	\$1,000	.10%	.10%
Eighteen Month	\$1,000	.10%	.10%
Two Year	\$1,000	.10%	.10%
Thirty Month	\$1,000	.10%	.10%
Three Year	\$1,000	.20%	.20%
Four Year	\$1,000	.20%	.20%

Certificates of Deposit

Minimum Balance to open and earn APY \$500.00

	<i>Interest Rates</i>	<i>APY</i>
3 Month Certificate	0.10%	0.10%
6 Month Certificate	0.15%	0.15%
7 Month Certificate	0.40%	0.40%
9 Month Certificate	0.20%	0.20%
12 Month Certificate	0.25%	0.25%
18 Month Certificate	0.50%	0.50%
24 Month Certificate	0.90%	0.90%
30 Month Certificate	1.00%	1.00%
36 Month Certificate	0.90%	0.90%
48 Month Certificate	1.00%	1.00%
60 Month Certificate	1.24%	1.25%



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Mutual Savings Association Advisory Committee -

For your information regarding the OCC Mutual Savings Association Committee, which focuses on what can be done to ensure the viability of mutuals:

OCC Hosts Mutual Savings Association Advisory Committee Meeting

WASHINGTON — The Office of the Comptroller of the Currency (OCC) today announced it will host a public meeting of the Mutual Savings Association Advisory Committee (MSAAC) on Wednesday, July 22, 2015, beginning at 1:00 p.m. Eastern Daylight Time (EDT).

The meeting will be held at the Office of the Comptroller of the Currency, 400 7th Street, SW, Washington, DC 20219.

The purpose of the MSAAC meeting is to advise the OCC on the regulatory changes or other steps the OCC may be able to take to ensure the continued health and viability of mutual savings associations and other issues of concern to mutual savings associations.

Members of the public may submit written statements to the MSAAC by:

• E-mail to MSAAC@OCC.treas.gov or

• Mail to: Michael R. Brickman, Designated Federal Officer, Mutual Savings Association Advisory Committee, Office of the Comptroller of the Currency, 400 7th Street, SW, Washington, DC 20219.

The OCC must receive written statements no later than Wednesday, July 15, 2015.

The meeting is open to the public. Members of the public who plan to attend or require assistance should contact the OCC by 5:00 p.m. EDT on Wednesday, July 15, 2015, by e-mail at MSAAC@occ.treas.gov, or by calling (202) 649-5420. Attendees should provide their full name, e-mail address, and organization, if any. For security reasons, attendees will be subject to security screening procedures and must present a valid government-issued identification to enter the building. Members of the public who are deaf or hard of hearing should call (202) 649-5597 (TTY) by 5:00 p.m. Wednesday, July 15, 2015, to make necessary arrangements.

Related Link:

• [Federal Register Notice](#)

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Thriftinve

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