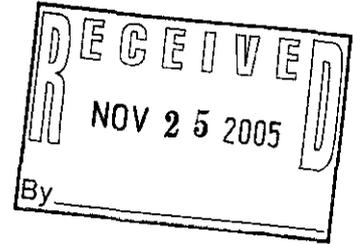




November 17, 2005

Robert E. Feldman
Executive Secretary
Attn: Comments/Legal ESS
FDIC
550 17th Street NW
Washington, DC 20429



Dear Mr. Feldman:

This letter is to comment on the proposed rules found at 70 Fed. Reg. 60,019 (Oct. 14, 2005) regarding Interstate Banking and Federal Interest Rate Authority.

These comments are submitted on behalf of State Central Bank, a state-chartered bank headquartered in Keokuk, Iowa. In addition to offices in Lee and Van Buren Counties in the far southeast corner of Iowa, State Central Bank also has a branch in Dubuque, in the northeast corner of the state. These locations put the bank in a "tri-state area" at both ends of the state – Iowa, Illinois and Missouri at the southern end and Iowa, Illinois and Wisconsin at the northern end. Although all of our branches are located in Iowa, because of our location we serve customers in a total of four states.

The lack of certainty as to what state law prevails has caused problems on more than one occasion. A recent example is our effort to promote a home equity product bank wide. When we contacted the company that provides us with our lending forms we were told that, if we wanted to offer this product in more than one state, they would advise us to purchase separate forms for each state due to variations in state laws with regard to home equity products. As you can imagine, we were not interested in developing four separate sets of forms, not were we really certain that it was necessary. This confusion delayed introduction of the product and made it unnecessarily time consuming and confusing.

The above is just one example of a situation where the proposed rules would make a practical difference to a community bank located in a multi-state area. Because of the advantages of certainty in this and other similar situations we urge adoption of the proposed rules.

Very truly yours,

A handwritten signature in cursive script that reads 'Jean D. Winnike'.

Jean D. Winnike
Senior Vice President and Counsel