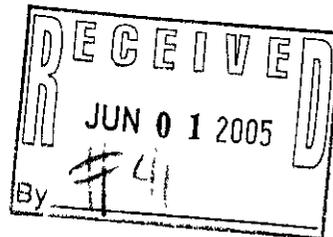




P O Box 10610, Russellville, Arkansas 72812
479-498-2400



May 23, 2005

Robert E. Feldman, Executive Secretary
Attention: Comments, FDIC
550 17th Street, NW
Washington, DC

Re: Classification of Commercial Credit Exposures FIL-22-2005

Ladies and Gentlemen:

I have now read this proposal four times in its entirety. I am sorry, but I see nothing at all that this does to enhance analysis of loans. All the proposed factors can be considered within the existing system, and more simply and better. I know of no problem that this will address, and it will simply abort over fifty years of mutual understanding and common vocabulary.

Why are there any rating disparities in the current system. If there are, someone isn't doing their job and trying to understand a credit. To use this kind of a system will create at least a ten year learning curve for my bankers and my board, and it will not improve your analysis of my bank. Further more, just the training we will need to provide our people will cost thousands of dollars and create an unnecessary regulatory burden. You just made everyone in our industry a rookie, and we will spend **thousands of dollars** PER PERSON in training to implement something no one in my size bank thinks we need. We understand and communicate just fine using the existing system.

Please drop this idea. It is bad, bad, bad. It will not help any regulator or any bank. If they cannot communicate or measure risk with the existing system, they won't with this one either.

Sincerely,

Charles H. Blanchard