



March 15, 2006

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

Dear Mr. Feldman:

I am writing this letter to convey my concern relating to the concentrations in Commercial Real Estate Lending and Sound Risk Management practices as proposed by the four bank regulatory agencies. Prior to the last 13 years as Chief Financial Officer and a member of the Board of Directors of the Bank of Canton, I spent 10 years in public accounting specializing in financial institution. I have worked on both sides of the industry reviewing sound risk management practices. At the end of the day, the asset quality of a loan portfolio can only be confirmed by independent sources such as a safety and soundness examination and/ or independent loan review.

Establishing guidelines, although intended to encourage sound risk management practices for institutions that exceed the prescribed loan to capital guidelines, will seriously impact the people and economies of the communities we serve. The current safety and soundness exam process is an established process that reviews bank policies for compliance together with the quality of individual loans.

As you are aware, proposed guidelines will become mandates by examiners and ultimately become rules and regulations. The financial institution industry is already highly regulated. The guidelines would not be able to differ between a spec loan with a 70% LTV and an owner-occupied loan with a 40% LTV. The application of uniform guidelines would hand cuff managements ability to build long-term, profitable relationships in the communities they serve.

I ask that you reconsider these proposed guidelines and rely on the safety and soundness exam process to minimize potential risk posed by concentration within the industry.

Sincerely yours,

John W. Wigmore
John W. Wigmore, SVP/CFO