

**From:** Joe D. Morris [mailto:jmorris@bocok.com]

**Sent:** Monday, September 11, 2006 4:47 PM

**To:** Comments

**Cc:** Ken C Fergeson

**Subject:** RIN 3064-AD09 Assessments

Dear Sir,

I have reviewed the proposal and find it to be detrimental to our bank and all de novo banks. We were chartered in December 02 and thus are no longer technically a de novo. However, this proposal would treat us a one which seems burdensome.

I don't feel de novo banks are inherently more risky than banks as a whole. In fact, I would suggest the chartering process is quite thorough which tends to eliminate risk. Further, de novo start with a strong capital structure and without asset quality issues. Our bank is very well capitalized, with good earnings and low levels of problem assets. Our exam ratings from the start are very favorable. I seen no reason to burden our bank simply due to it's age. I would ask this "standard" for setting premiums be reconsidered.

Yours,

Joe D. Morris, Chairman and CEO  
Bank of Commerce  
Duncan Oklahoma