

Corporate Credit Risk

200 W. Second Street (27101)
P.O. Box 1240
Winston-Salem, NC 27102
(336) 733-2193
Fax (336) 733-2229

October 23, 2009

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 204299

Dear Mr. Feldman,

We have reviewed FIL-55-2009, Correspondent Concentration Risks, and generally find it to be thoughtfully completed and conducive to effective risk management of correspondent relationships at BB&T. To be sure, we have been and remain focused on these risks with appropriate policies and procedures very much in keeping with the spirit and intent of the proposed guidance. Further, the proposal will prompt us to evaluate the strengthening of certain components in this area of risk management in the spirit of constant improvement and diligence.

We would offer, however, that we do not favor the explicit definition of ranges and tolerances for specific measures in the analysis and monitoring of correspondent institutions. Instead, we would maintain that a comprehensive view of our correspondents' capital position, asset quality, liquidity, and profitability promotes a more accurate assessment upon which we would respond in the context of actively managing our asset and liability exposures. We base this position on the assertion that the singling out of specific measures as a basis for action yields an incomplete view of the condition of a given correspondent. Further, we would maintain that we would not have a meaningful statistical basis on which to form the recommended ranges and tolerances.

We very much appreciate the opportunity to comment on the proposed guidance and look forward to and comments or questions you may have regarding our position at BB&T.

Sincerely,



Kenneth L. Daniels
Chief Credit Risk & Policy Officer
Executive Vice President

Cc: Clarke Starnes
Barbara Duck