FIRST FINANCIAL HOLDINGS, INC.

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March 24, 2006

Mr. John Carter
Regional Director
Federal Deposit Insurance Corporation
25 Jessie St. at Ecker Square, Ste. 2300
San Francisco, CA 94105-2758

Re: Comments Regarding FDIC Application #20051977: Wal-Mart Application for Insurance and Industrial Bank Charter

Dear Mr. Carter:

First Financial Holdings, Inc. is a $2.6 billion Financial Services Holding Company headquartered in Charleston, South Carolina. Its principal subsidiary is First Federal Savings and Loan Association of Charleston. Our operations include a broad array of banking services to retail and business customers, extensive insurance products and services, and trust and investment services.

Over the last ten years, we have developed a strong and mutually beneficial partnership with Wal-Mart. Based on our experience and interaction with the management at all levels in the Wal-Mart organization, and particularly the management and staff of the Wal-Mart Superstores, where we have established several in-store branch sites, we are not surprised by their remarkable success. That success comes from a core commitment to delivering the very best value to their customers. While some may find fault in this singular focus on the customer, no one can deny its result. Wal-Mart, an American company, is the largest and most successful retailer in the world. We believe this accomplishment should be a source of national pride.

In all of our contractual relationships, we have found Wal-Mart to be more than fair, often agreeing to extend terms or provisions we find desirable for the success of our banking operations at Wal-Mart Superstores. Indeed, there is a very high level of cooperation and consideration extended by Wal-Mart senior management and store management at each of our in-store bank sales offices.

We expect to continue and expand this relationship by opening new banking facilities in several additional Wal-Mart locations in South Carolina. Our shared customers have a high level of satisfaction with the banking services provided and the significantly enhanced convenience of seven-day-a-week banking.

Wal-Mart's impact on South Carolina and, in particular, the markets we share with them is significant. Wal-Mart employs almost 27,000 people and supports over 900 South Carolina companies that provide merchandise and services to Wal-Mart, indirectly supporting more than 35,000 additional jobs.

Our Company has a long history of community involvement including significant support for community-based arts, health and human services organizations and public education. We are very pleased that Wal-Mart shares an exceptionally strong commitment to the communities we serve through their generous support to numerous charities and other community based organizations.

Through the philanthropy of Wal-Mart and Wal-Mart Associates, South Carolina based non-profits received over $4 million in 2004. In particular, Wal-Mart shares with our company an emphasis on improving public education. Their literacy grants, community scholarships and Teacher of the Year grants have a significant and positive impact on South Carolina schools. We also appreciate their commitment to match employee donations to area United Ways resulting in a material impact on support of important community initiatives.

We have reviewed Wal-Mart's application for deposit insurance and many of the numerous comment letters that have been filed with the FDIC. We believe the application is limited in scope and is consistent with similar applications by other organizations whose operations have been favorably impacted through access to electronic payment systems. A key competitor of Wal-Mart, Target Corporation operates Target Bank under a Utah Industrial Bank Charter. These operations proposed by Wal-Mart are similar to those of Target Bank. We also note that the application specifically states that Wal-Mart Bank will not be open to the general public, nor will it operate branch offices.

We greatly appreciate the opportunity to present these comments. Should you have any questions or require further information, please contact me.

Sincerely,

A. Thomas Hood
President and CEO

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