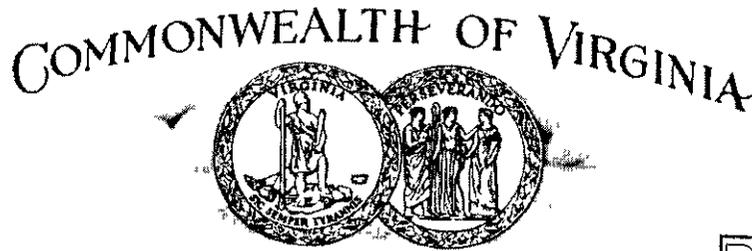
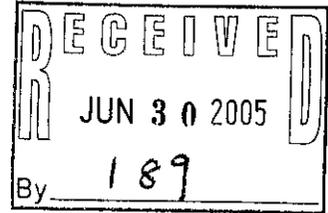


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BUREAU OF FINANCIAL INSTITUTIONS



June 28, 2005

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

Re: Interagency Proposal on the Classification of the Commercial Credit Exposures

Dear Mr. Feldman:

I have reviewed the Interagency Proposal on the Classification of Commercial Credit Exposures and fail to see how it is an improvement over the current system. As a regulator, I see no advantage to the new system over the old. Many of the "new" considerations discussed, such as how collateral and guarantees mitigate loss, are already being factored into the current system by bankers and regulators. How putting more factors into the mix is going to increase consistency is beyond me. If there are currently inconsistencies, they will be magnified, not mitigated, by more factors to consider.

I could go on and on, but in the interest of your time and mine, let's just say I see this as more unnecessary regulatory burden being put on community banks. Given no significant enhancement to the current classification system, the proposal should be withdrawn.

Very truly yours,

John M. Crockett
Deputy Commissioner

JMC/bbn