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June 13, 2005

E-mail: Comments@FDIC.gov
Subject: Docket Number OP-1227
Robert E. Feldman, Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

E-mail: regs.comments@federalreserve.gov
Subject: Docket Number OP-1227
Jennifer J. Johnson, Secretary, Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Dear Mr. Feldman and Ms. Johnson:

I am writing to express my opposition to the Interagency Proposal on the Classification of Commercial Credit Exposures.

As a director of the Titonka Savings Bank, a \$100,000,000 bank with three offices in rural Iowa communities, I do not believe that this intricate and complex new classification proposal will provide any tangible benefits to our institution or to other small and medium size institutions

Like so many other federally imposed regulations, compliance with the new proposal would be extremely burdensome and would divert human and other resources away from our primary mission of providing quality financial services in a friendly, convenient and confidential manner. The current classification system is and will continue to be a sufficient system for identifying the quality of our bank's loans.

If the agencies do choose to implement the new classification proposal, it should be done on a "test" basis and should be limited to large institutions that have the additional resources required to work out issues related to the implementation of the new regulations.

Sincerely,



Quentin R. Boyken
Director Titonka Savings Bank