

March 21, 2006

Robert E. Feldman  
Executive Secretary  
Attn: Comments/ Legal ESS  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Dear Mr. Feldman:

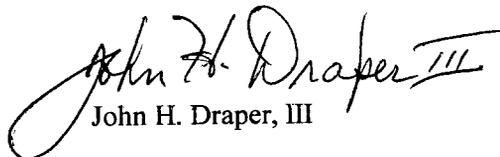
The proposed guidelines regarding "Concentration in Commercial Real Estate Lending, Sound Risk Management Practices" generates tremendous concerns for me as a long time director of a community bank. We all recognize the critical importance of prudent commercial real estate lending and we believe that our bank has established appropriate policies and practices to carry out our mission as a community bank. Additionally, we have a quarterly outside loan review of our portfolio to identify any weaknesses or trends needing attention.

The threshold tests proposed ignore the actual risk factors associated with our portfolio and these new regulations will require our mutual institution to increase its capital levels simply because we have a concentration in commercial and construction loans.

We believe if you find it necessary to impose threshold tests then you should exclude multi-family loans, pre-sold construction and construction to permanent financing with either firm takeouts or established cash flows that provide sufficient debt service coverage.

We are truly committed to serving the financial needs of our community with a strong well-capitalized bank. We believe the present system of determining adequate capital levels based on a thorough analysis of the individual institution is appropriate.

Sincerely Yours,

  
John H. Draper, III