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BANKERS of AMERICA**

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President and CEO

October 16, 2009

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

Ms. Jennifer J. Johnson
Secretary
Board of Governors
of the Federal Reserve System
20th Street & Constitution Av NW
Washington, DC 20551

Office of the Comptroller
of the Currency
250 E Street SW
Mail Stop 2-3
Washington, DC 20219

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

Submitted via email

Re: Correspondent Concentration Risks
Federal Reserve System Docket No. OP-1369, Office of the Comptroller
of the Currency Docket ID OCC-2009-0013, Office of Thrift Supervision
Docket ID OTS-2009--20016

Dear Sirs or Madams:

The Independent Community Bankers of America (ICBA)¹ respectfully requests the agencies referenced above extend the comment period for the proposed guidance on correspondent concentration risk for an additional thirty days.

The proposed guidance adds new regulatory burden for respondent and correspondent banks and has the potential to alter the successful and long-

¹ *The Independent Community Bankers of America represents nearly 5,000 community financial institutions of all sizes and charter types throughout the United States and is dedicated exclusively to representing the interests of the community banking industry and the communities and customers we serve. ICBA aggregates the power of its members to provide a voice for community banking interests in Washington, resources to enhance community bank education and marketability, and profitability options to help community financial institutions compete in an ever-changing marketplace.*

With nearly 5,000 members, representing more than 20,000 locations nationwide and employing over 300,000 Americans, ICBA members hold \$1 trillion in assets, \$800 billion in deposits, and \$700 billion in loans to consumers, small businesses and the agricultural community. For more information, visit ICBA's website at www.icba.org.

standing correspondent banking model. Additional time is needed to thoroughly analyze the proposal's impact and to consider various alternatives.

ICBA appreciates your prompt consideration of this request. If you have any questions, please contact the undersigned by telephone at (202)659-8111 or by email at viveca.ware@icba.org.

Sincerely,

/s/

Viveca Y. Ware

Senior Vice President

Payments & Technology Policy