



October 23, 2009

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VIA EMAIL: comments@fdic.gov
Robert E. Feldman, Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, DC 20429
Docket No. OP-1369

VIA EMAIL: regs.comments@federalreserve.gov
Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, DC 20551
Docket No. OP-1369

VIA EMAIL: regs.comments@occ.treas.gov
Office of the Comptroller of the Currency
250 East Street, S.W., Mail Stop 2-3
Washington, DC 20219
Docket ID OCC-2009-0013

VIA EMAIL: regs.comments@ots.treas.gov
Regulation Comments
Office of Thrift Supervision
1700 G. Street, NW
Washington, DC 20552
Docket ID OTS-2009-20016

RE: Proposed Guidance on Correspondent Concentration Risk;
74 Federal Register 48955, September 25, 2009

Ladies and Gentlemen:

The Independent Bankers Association of Texas (IBAT), representing over 2,000 community banks and branches in Texas, appreciates the opportunity to comment on the proposed guidance on correspondent concentration risk.

Because this is an extremely complex issue in a highly specialized area of banking, we respectfully request an extension to the comment period to allow us to determine the probable effect of the proposed guidance. Our goal is to assure that our member banks are treated fairly and consistently; that care is taken in limiting options to correspondent services, liquidity, and capital; and that free market principles are applied. With additional time, we can assess whether these are prudent guidelines that achieve those goals. Rather than suggest an extension period, we trust that you will grant whatever additional time that you believe is fair.

We at IBAT are grateful for both your decision to grant an opportunity to allow comments on this guidance, and for your thoughtful consideration of our comments on this critical issue.

Sincerely,

Christopher L. Williston, CAE
President and CEO