

THE BANKERS' BANK COUNCIL

First National Bankers Bank, Alabama
Vic Nichol, President/CEO
Homewood, AL

Arkansas Bankers Bank
James Thomason, President/CEO
Little Rock, AR

Bankers' Bank of the West
William Mitchell, President/CEO
Denver, CO

Bankers' Bank, Northeast
Peter J. Sposito, President/CEO
Glastonbury, CT

Independent Bankers' Bank of Florida
Jim H. McKillop, III, President/CEO
Lake Mary, FL

Independent Bankers' Bank
Jim Jones, President/CEO
Springfield, IL

The Bankers Bank of Kentucky
William Fallon, President/CEO
Frankfort, KY

First National Bankers Bank
Joseph F. Quinlan Jr.
Chair/President/CEO (HC)
Baton Rouge, LA

United Bankers Bank
William Rosacker, President/CEO
Bloomington, MN

Mississippi National Bankers Bank
Joseph Neely, President/CEO
Ridgeland, MS

Midwest Independent Bankers Bank - MIB
L.D. McDonald, Vice Chairman
Jefferson City, MO

Nebraska Bankers' Bank
David Ochsner, President/CEO
Lincoln, NE

Great Lakes Bankers Bank
Thomas W. Tenwalde, Vice Chairman
Gehanna, OH

The Bankers Bank
Don Abernathy, Jr., President/CEO
Oklahoma City, OK

TIB-The Independent Bankers Bank
Michael G. O'Rourke, President/CEO
Dallas, TX

Atlantic Central Bankers' Bank
Jon Evans, President/CEO
Camp Hill, PA

Community Bankers' Bank
William H. McFaddin, President/CEO
Midlothian, VA

Bankers' Bank
Ron Slater, President/CEO
Madison, WI

November 24, 2009

VIA EMAIL: comments@fdic.gov
Robert E. Feldman, Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, DC 20429

**RE: Proposed Correspondent
Concentration Risk Guidance**

VIA EMAIL: regs.comments@federalreserve.gov
Jennifer J. Johnson, Secretary
Board of Governors of the
Federal Reserve System
20th Street & Constitution Avenue, N.W.
Washington, DC 20551

RE: 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

RE: Docket ID OCC-2009-0013

The Bankers' Bank Council ("BBC") is fully committed to the safe and sound practice of banking, including regulations to the intended effect of measuring, monitoring and controlling correspondent concentration risk. As explained in BBC's previously-submitted comment dated October 26, 2009, incorporated herein by reference, elements in the proposal should be reconsidered, modified and clarified in order to achieve their salutary objectives while minimizing undue hardship and disproportionate burdens for community banks.

Since the date of its original submission, BBC has obtained confirmation that many of its members' respondent community banks view the present wording of the proposed guidance as supplying grounds for field examiners to criticize a respondent's credit exposure near, at, or above 25% of its Tier 1 capital to any correspondent, no matter how well the correspondent is capitalized. Therefore, if the proposed guidance will contain any internal touchstone for correspondent credit exposure other than a reference to Reg. F, our respondent community banks would suggest the threshold is more appropriately set at not less than 50% of Tier 1 capital.

Thank you for your consideration.

Sincerely,

Don Abernathy, Jr.

Don Abernathy, Jr., Vice Chairman
The Bankers' Bank Council